DOCUMENT RESUME

ED 184 440 HE 012 465

TITLE	Impact of State and Federal Regulation and Reporting Requirements on Miami-Dade Community College: Institutional Self Study.
INSTITUTION	Miami-Dade Community Coll., Fla.
SPONS AGENCY	Sloan Commission on Government and Higher Education, Cambridge, Mass.
PUB DATE	Oct 77
NOTE	214p.; For related Sloan Commission documents, see ED 161 306, ED 176 679, ED 179 174, ED 180 273, HE 012 421-427, HE 012 429-432, HE 012 434-439, HE 012 442-445, HE 012 448-449, HE 012 465-474, HE 012 476-480, HE 012 482-490.
EDRS PRICE	MF01/PC09 Plus Postage.
DESCRIPTORS	Academic Records; Case Studies; College Administration; College Planning; *Community Colleges; Community Education; *Compliance (Legal); Educational Finance; Educational Opportunities; Employment Practices; *Federal Regulation; *Government School Relationship; Higher Education; Institutional Autonomy; Institutional Research; Job Placement; Noncredit Courses; Personnel Policy; *Recordkeeping; Self Evaluation (Groups); State Government; States Powers; Statewide Planning; Veterans; Vocational Followup
IDENTIFIERS	*Miami Dade Community College FL; *Sloan Commission Studies

ABSTRACT

Results of a self-study conducted by Miami-Dade Community College, Florida, on the impact of state and federal regulation and reporting requirements are presented. The following areas have resulted in difficulties for the college in dealing with regulatory requirements: the Family Rights and Privacy Act (Buckley Amendment); administration of Veteran's program and benefits; Veteran's Administration requirements for students enrolled in the Life Lab Program; statewide course designation and numbering project; State of Florida retention schedule; the impact of placement and followup requirements; community instructional services program; occupational advisory councils; impact of state and federal regulations and reporting on the college personnel office; increase in state reporting relative to capital outlay projects, mail and activity inventory; and the impact of state and federal regulations on the content of the meetings of major college committees. Among the observations are the following: (1) funds are not being provided to offset the costs associated with new reporting and regulation requirements; (2) there has been an invasion of academic decision-making by the state and federal governments; (3) there is a decline in morale among faculty and staff of colleges and universities that may be related to regulations, expenditures, and declining attention of administrators to concerns for programs and students; and (4) changes and additions to reporting and regulation requirements interfere with planning efforts. Interview questions are appended. (SW)

ED184440

INSTITUTIONAL SELF STUDY

IMPACT OF STATE AND FEDERAL REGULATION AND REPORTING REQUIREMENTS ON MIAMI-DADE COMMUNITY COLLEGE

Prepared for

The Sloan Commission on Government and Higher Education

U S DEPARTMENT OF HEALTH
EDUCATION & WELFARE
NATIONAL INSTITUTE OF
EDUCATION

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Miami-Dade Community College
11011 SW 104 Street
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October 1977

HE012465

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FOREWORD

Miami-Dade Community College has undertaken a study on the impact of state and federal regulation and reporting requirements as input to the Sloan Commission on Government and Higher Education. The impact of increasing regulation and reporting is so pervasive that it was not possible to do a comprehensive study with the time and resources allocated. Therefore, the decision was made to gather information to illustrate the dramatic impact of the changing relations with state and federal government. The special problems of community colleges are reflected in the more important role of state reporting and regulation shown in this study.

In 1974 the College participated in a study conducted by the American Council on Education on the cost of Federally mandated reporting. The statistical data that was gathered for that report is included as a section of this study.

We are very concerned that the focus of attention concerning changing relations between institutions of higher education and the state and federal government <u>not</u> be on reporting. I am convinced that data concerning cost of reporting, including those prepared by Miami-Dade, are almost certainly understated. It is very difficult to trace the costs for collecting data for reports through all of the echelons of an institution. The tendency is to only report the effort by those directly involved in producing the report that is submitted, and to miss all of those providing input. But even more importantly, the reports generally consider only added costs, that is, new personnel, new programming efforts, etc. In a period when most colleges are suffering financial strain, personnel to deal with new reporting requirements have been

added very slowly. The primary method for meeting these new requirements has been to simply add the requirements to those already on the staff. The important negative impact of this practice is just beginning to be felt. At Miami-Dade we have "gone to the well" as often as we can, notifying personnel that there is another report with short lead time that just must be done, and asking them to "hitch up your britches" just once more and get it done. Staff simply are no longer impressed with that plea. The extra work has been achieved both by allowing other work to stand undone, or by people working additional hours and carrying work home. We hear similar comments from colleagues throughout the country, and the feeling is very much the same -- administrative personnel do not have the time to deal with their primary tasks, and they have been asked as often as possible to take on additional tasks.

The most important reason that we wish to focus on regulations is that the cost of implementing regulations far exceeds that of reporting. Growing external regulation has forced this institution into dramatically increased regulation of the practices of all departments of the College. Staff, especially department chairpersons and other management personnel, feel helplessly enmeshed in an ever expanding and more intricate bureaucratic web. The added financial burden of regulation is clear as it involves all college activities, but the greatest cost to the colleges is the impact on staff morale and creative efforts.

At this time it is clear to most that there is need for considerable change in the practices of our colleges and universities. While it is also clear that growing state and federal regulation (much promulgated in reaction to concern for the practices of colleges and universities) is making the task of change more difficult, in my opinion, it is also

contributing significantly to the widely acknowledged decline in morale of the faculties and staffs of colleges and universities.

The following are the major points that we have tried to illustrate in this study.

1. In these difficult financial times there is an important cost associated with new reporting and regulation requirements of the state and federal governments. Funds are not being provided to offset those costs.
2. Beginning in the late sixties, there has been evidence of public dissatisfaction with programs in colleges and universities. This has resulted in what I believe to be a very dangerous practice--the invasion of academic decision-making by the state and federal governments.
3. The decline in morale among faculty and staff of colleges and universities. Growing state and federal regulation contributes significantly to this problem; however, in many cases, the faculty do not perceive the state and federal governments as the source of the problem, as they are impacted indirectly through increasing internal institutional regulations, increasing administrative expenditures, and declining attention of administrative personnel to concerns for programs and students.
4. One other factor contributing to morale problems is the time and effort spent in the development of seemingly pointless reports, and the implementation of seemingly pointless over-regulation. This has led to credibility problems at all levels of the organization.

5. In a time when careful planning seems particularly important, changes and additions to reporting and regulation requirements paralyze planning efforts by making it increasingly difficult to predict the future, and by tying up those who should be concerned with planning. A good illustration for Miami-Dade is the Community Instructional Services program rules which implemented State legislation that was passed on short notice. These rules considerably altered enrollment patterns by reducing the College's capability to attract non-credit students in less than affluent neighborhoods, and dramatically added to processes necessary to implement such programs.
6. Regulation and reporting requirements are increasing at an exponential rate. This is shown dramatically by new requirements that the College received in the first week of September, 1977. We have not estimated costs for those requirements, but it seems clear to us that they will be a multi-hundred thousand dollar figure.

Robert H McCabe
Project Director

COLLEGE STUDENT AFFAIRS
STUDENT RECORDS, REPORTS, VETERANS' PROGRAMS AND BENEFITS

Introduction

During the past ten years, there has been a dramatic acceleration of statutory based requirements from federal and state levels imposed upon the national educational enterprise including universities, colleges, secondary and primary educational institutions. The impact of federal and state regulatory practices on institutional operations and effectiveness relating to student affairs created the need for considerable additional expenditures of resources in order to comply with these required mandates. The increasing encroachment of governmental agency actions has been most clearly apparent since 1970. Complex federal and state student reporting and record requirements are of major concern. Excessive and changing statutes, regulations, rules, and directives are frequently overlapping and inefficient.

Miami-Dade Community College has been heavily impacted by numerous federal and state laws, regulations, rules and directives in the student records area since 1970. Compliance by the College in meeting the various governmental requirements has frequently created a labyrinth of complexities throughout working units in the admissions, registration and records areas. Examples include: The Family Rights and Privacy Act (Buckley Amendment), State of Florida Records Retention Schedule, Veterans' programs and benefits, Veterans Administration requirements, Life Lab programs, Florida Statewide Course Numbering Project and numerous other directives which, individually may not appear burdensome, but collectively create stress for College resources and operations.

It is estimated that the imposition of the numerous new, revised or withdrawn governmental requirements on the area of Miami-Dade student records functions has imposed an increase in supportive staff by at least ten - fifteen percent since 1970. More serious, the imposition of over-riding work loads to comply with governmental requirements has necessitated that entire existing professional and classified staff in student affairs devote an estimated twenty-five percent of their efforts to meet governmental demands. It is also estimated the financial cost expended to support federal and state requirements, including professional and career staff, federal, regional, state and local committees and meetings, planning sessions, systems analysis and programming, forms development and purchases, publications development and purchases, participation in workshops, internal training, and a myriad of associated compliance intricacies, has amounted to well over two million dollars at Miami-Dade since 1970. This estimate would almost certainly prove to be conservative if a thorough cost analysis study were conducted. The conversion alone to the new statewide common course numbering system has been estimated to have a direct cost of $250,000.

The following sections present an administrative viewpoint concerning encumbering governmental intervention into the student affairs areas of Miami-Dade Community College as well as a number of specific examples indicating the difficulties encountered by the College in attempting to comply with complex and excessive regulatory requirements.

AN ADMINISTRATIVE VIEWPOINT OF THE INPUT OF STATE AND FEDERAL REGULATIONS IN STUDENT AFFAIRS

Over the span of time since 1970, the increase in state and federal regulations relating to student affairs has been absolutely staggering! An educational administrator/manager with the coordinating role in the area of student affairs spends an inordinately high amount of time dealing with regulations promulgated from outside the institution. If there is a single change in the function of chief student affairs officers or educators with leadership responsibilities in the area of student personnel services, it has been the shift away from developing, implementing and evaluating programs which are created at the institution. The emphasis now is by necessity one of reaction; that is, trying to respond to various federal and state legislation in the area of students' affairs to make certain that the institution is in compliance. It is a dramatic shift in roles and responsibilities! No longer is it an inward-looking College and community oriented responsibility, but now it is more of an outward-looking State/Federal directed compliance responsibility that simply tries to keep the house in order in regard to the great myriad of laws, regulations, procedures, and guidelines that have come forth from the federal and state governments.

It is extremely important now for someone within the College to be the "expert" in regard to what the requirements are for all of the various rules and regulations that have been made outside the institution. In addition, when there is an opportunity to develop internal procedures or to propose creative policies for the institution, all of this work now must be done in relationship to what is acceptable and what aligns

well with all the existing rules and regulations. Thus, what is emerging is a new requirement to be a quasi-legal authority concerning existing federal and state laws, with the additional need to have some indication of where laws may change, and what new trends prevail regarding legislation. It also certainly requires someone to become very well acquainted with and to work very closely with the College attorney. More and more reliance on advice from the College attorney relative to existing laws is absolutely essential. All this suggests a requirement of some very different skills for individuals coordinating student affairs than those needed five years ago. Humanistic, creative and imaginative student oriented educational administration and management is being subverted by restrictive regulatory mandates from State and federal levels.

The net effect of excessive regulating causes one to become very cynical and somewhat nonresponsive to institution requirements. For example, in the last two years there have been so many laws or regulations that have been passed which simply cannot be implemented at the College. It is either not practical; cannot be implemented because of the costs; cannot be implemented because of lack of time for development of processes and capability; or it is a provision that simply is outside of the capacity of the institution to respond. Therefore, the cumulative effect of administering all these types of regulations is that when one hears about another one is to say "well, that's just another example of something that we can't do." It really doesn't matter how many regulations come down--we can only implement and respond to those that are reasonably practical and for which the institution has some expectation that it can meet the requirement. A few examples follow:

Example 1. The Family Rights and Privacy Act was passed by the United States Congress in 1974. There were great inconsistencies regarding the Buckley Amendment, and the state regulations on the same subject. It was a completely confusing and frustrating mess between the state and federal governments. We had opinions both from the Attorney General of Florida and from our own attorney that where there were conflicts in the laws and that we should follow the state regulations. It became clear very quickly that the state regulations as promulgated could not be implemented. For a long time many provisions of the Buckley Amendment could not be implemented. The situation in Florida was a nightmare; and it was only in this past legislative session (1977) that the State passed a bill entitled Student Records, Chapter 77-60 (SB 359) which was an attempt to align the state law more closely with the Buckley Amendment.

What is required now at the College to comply with these revised state and federal laws is a great deal of additional study and analysis including consultation with a number of professional staff at Miami-Dade and the College attorney. One of the more discouraging things about this process is that almost without fail, in each issue of The Chronicle of Higher Education, mention is made that some portions of the Buckley Amendment are subject to change in the Congress. Any one of the changes could again seriously alter the approach that the College takes to implement the Buckley Amendment.

The implementation process to comply with the complexities of the Buckley Amendment is staggering. There was a report in The Chronicle of Higher Education that Harvard spent some sixty-thousand hours trying to determine how to implement the Buckley Amendment. It was also reported that Ohio State spent in the neighborhood of $250,000 in an implementation

process. And even though the law was originally enacted in 1974, it was not until June of 1976 that the guidelines were issued by the federal government to implement the law. Imagine the confusion and the utter amount of wasted time that colleges and universities all across the nation put forth in trying to work with the law as originally conceived? Even after the regulations were published, it still took considerable interpretation and guidance to be able to proceed.

The National Association of College and University Business Offices published a twenty-three page document attempting to assist colleges and universities in implementing the Buckley Amendment. The American Association of Collegiate Registrars and Admissions Officers published a document entitled "A Guide to Post Secondary Institutions for Implementation of the Family Educational Rights and Privacy Act of 1974, as Amended." This particular booklet represented fifty-two pages of suggestions and assistance in trying to work with the Buckley Amendment.

Due to the conflicts between the Buckley Amendment and the state requirements in Florida, the College had to use delaying tactics while disregarding both sets of rules, regulations, and guidelines. We had to adopt a common sense approach to dealing with the topic of records release until such time as the state and federal governments could get reasonably closer together. Thus, certain features of the Buckley Amendment were implemented where possible, and the College worked with the overall concept of protection of individual rights and records. The College had always worked toward that end since the President early in the College's history established a policy of not releasing information about students to outside parties. Where there was uncertainty, the College used its best judgment regarding questions of release of records.

This procedure was effective and protected student rights without major incident for many years. At the moment the College is examining the new state law and attempting to again develop a set of policies and procedures relative to release of student records and information that will be consistent with state and federal laws. The process will be involved. It will require an extensive amount of time in the drafting of procedures. There will be a host of meetings and review sessions among the faculty, administration, and staff; and it will probably be a three-to-six-month process before a procedure can finally be established at the institution. Furthermore, a revised State Department of Education rule is being rewritten based on the new State law which may not be available in final form for many months, thereby, compounding problems of implementation schedules and compliance. The work is going forward but due to the continuing problems and confusion more creative developmental efforts that could be directed toward the educational process have been inhibited and delayed.

Example 2. The "85/15 Rule" from the Veterans Administration simply was not implementable. It was suspended, when the higher education community across the nation rallied to make the case that there was no way in which a response could be expected in the time alloted. A law passed by the State in regard to veterans contained language, which if implemented, would have negated another law which provides 60-day payment deferrals for veterans. The purpose of the legislation was to permit 60-day deferrals of payment of fees after the start of the educational program to allow time for the veterans to receive money (veteran benefit checks) so that the front-end charge of tuition and books, etc. could be covered. However, the language of the law would have forced

many veterans with the 60-day deferment to pay before the beginning of an academic term, which is not required without the deferment. Due to such ill-conceived and nonimplementable rules there is a genuine frustration among student affairs personnel who seem always to be scrambling to "fix" some other problem or to decide whether or not to implement regulations.

Example 3. Internal procedures for students to air grievances must be consistent with civil rights requirements of Title IX of the Education Amendments of 1972 and their companion regulations. Procedures dealing with student discipline must be consistent with a variety of state laws and rules such as the Sunshine Law, to laws and regulations regarding convictions of drug offenses, and a great variety of federal laws and regulation in the area of due process. Regulations regarding the appropriate distribution of literature on the campus must not be in conflict with recent court decisions at the federal and state levels, and must accommodate all the various new interpretations and varied provisions of multiple laws and legal interpretations. Further, specialized services which the College has must continually be adjusted to meet new requirements of law such as the Handicapped Act.

In summary, there is no doubt that time, responsibilities, and activities have all been dramatically affected by the great volume of rules and regulations emanating from state and federal levels. They have clearly shifted administrator and managerial time allocations, and they have dramatically shifted competencies and skills needed to perform effectively within an institution. Many of those regulations, have had no positive impact in improving the educational services to students--on the contrary the implementation has stolen time, effort and dollars

from the primary purpose of the College--provision of educational services to students.

THE FAMILY RIGHTS AND PRIVACY ACT (BUCKLEY AMENDMENT)--STATE REGULATIONS RELATING TO ACCESS TO STUDENT RECORDS: HISTORY, PROBLEMS, AND COST OF IMPLEMENTATION

History

On August 21, 1974, President Ford signed into law the Educational Amendment Act of 1974. This contained a section known as the Buckley Amendment. It became effective November 19, 1974. It was probably one of the most ill-conceived pieces of federal legislation that has ever been enacted. There were no public hearings on the topic, and in actuality it worked against the original intentions and impacted students and institutions of higher education in a multitude of devastating ways.

Since it became law, colleges and universities across the country have raised continuing protests. This resulted in the law being amended, and the amendment being retroactive to the original date of its implementation.

In the meantime, there was an existing Florida State Board of Education regulation on the same topic which, on various points, is in conflict with the existing federal law. There is still great confusion, misunderstanding, and misinterpretation regarding what to do on various issues related to the release of student information. The State has advised us to follow the State regulations when they are in conflict with the Federal regulations; also, most colleges and universities are actually awaiting more detailed guidelines of how to interpret the present federal law. These have not yet been issued, and their importance is paramount in trying to implement a complete compliance program with the State and Federal laws in this regard.

There have been a series of meetings, conferences, discussions, proposed College policies and procedures, all in trying to wrestle with the problem. At the moment, Miami-Dade is in a "hold" status awaiting the release of the federal guidelines and playing the issue by ear by using our best judgment on a variety of issues.*

Problems

Both the State Board of Education regulation and the Federal legislation on the release of student information will cause considerable hardship on Miami-Dade when fully implemented. Both the State Board regulation and the Federal law (Buckley Amendment) provide that the College must afford the student the opportunity to indicate if he/she does not wish certain information (defined as directory information) to be released. If a student does not inform the College that he/she desires that this information not be released then there are provisions that the College may release this in certain circumstances. But to obtain this information from the student poses a substantial problem for the College, again considering our diversified student population and our various registration procedures (through the mail and at hundreds of different locations).

A form would have to be generated for the student to come in and sign if he/she does not want directory information released; all of the computer programs must be modified so that all printouts on which the information appears can be noted so that this information for those students requesting it can be protected. This would create the need for an additional programming and systems effort. Since Miami-Dade is so large and has so many new students in each semester; an advertisement

process, collection of forms, coding of forms and recording student data information must constantly occur. Also, opportunities have to be provided for students to change their minds at any point in the year. This is a major and costly undertaking.

The second area of concern is the need to keep accurate records of what information is released by the various custodians of records that we have at the institution and filing this information in the student folder; again, more time, more effort on filing, and keeping track of forms, etc. This effort will certainly require additional staffing and cost.

The Federal law provides for both formal and informal hearings should a student wish to challenge a record. Since the law provides for these two hearings, a student has the right to request a more formal hearing, and if necessary, appeal all the way up to HEW. In the past, these matters could be handled on a less formal basis with an appeal through the college administrative channels. The procedural part of this Act can be appealed to HEW, and possibly even the decision of the purging the records may also be made to HEW. This could involve additional personnel, attorneys fees, and associated costs.

Another major problem area is the conflict between the State and Federal legislation previously mentioned. The inaction of the Florida legislature to bring the State law into line with the Federal law, and the inaction of the Secretary of HEW to issue final guidelines on the topic, is causing major problems. The preliminary guidelines have been out for a year. The college is caught between both laws, uncertain of what to do until final regulations are issued and conflicts resolved.

Another troublesome procedure of the federal law provides that a student should be notified of the issuance of subpoenas of his records

before the subpoena is honored. A phone call, letter, or telegram would probably suffice; but again, more regulations, more paper, and more documentation are needed to take this action.

Some samples of the unforeseen impact of both the State and Federal legislation are that the College is unable to issue a graduation program listing graduates, release a roster of an athletic team to the newspaper, or provide the height or weight of an athlete without first affording the person named the opportunity to have this information not released. Further, an instructor cannot post grades on an office door by student numbers without the same type of release. The whole process of keeping track of which students want information released and which students do not will be very cumbersome and costly for Miami-Dade. It will take resources desparately needed for educational programs.

* Since the writing of this document, a new State law has been passed effective July 1, 1977, which improves previous ambiguities. A revised Department of Education Rule is currently being rewritten and is expected by December, 1977.

Direct Implementation Cost Estimate

1.	One professional person to design and manage the system	$16,000
2.	One systems analyst work - six months	8,000
3.	Anticipated increase in attorney's fees for work on the project	5,000
4.	Additional computer processing time, paper copy costs, miscellaneous costs	4,000
	Direct Implementation Costs	$33,000
5.	Other estimated cost - professional time, meetings, committees	25,000
	Total Implementation Cost	$58,000
	Ongoing annual maintenance estimated cost	$25,000

ADMINISTRATION OF VETERANS PROGRAMS AND BENEFITS

Until Fiscal Year 1975 the U.S. Congress, the Veterans Administration and educational institutions have cooperated to improve the G.I. Bill and the implementing regulations. As a result of the combined team effort, educational opportunities and services to Vietnam veterans have been provided in the best interest of the veterans. It had become evident, however, that a few veterans and a few educational institutions were abusing the benefits authorized under the improved G.I. Bill and the VA regulations. In 1975 the Veterans Administration launched a "campaign" to correct the few abuses through continuous and pervasive regulations imposing numerous restrictions and extensive reporting procedures on all educational institutions enrolling veterans. In this campaign, the VA has intruded into the management of higher education, infringing upon institutional prerogatives and seriously limiting the services to veterans as intended by legislation of the U.S. Congress.

One effect of the new VA regulations is significant discrimination against veteran students receiving benefits who can no longer pursue a higher education under the same academic standards prescribed for other students. A strong VA lobbying effort convinced congressional committees to include support for VA restrictive policies in the October 1976 amendments to the G.I. Bill.

As a result of the 1976 legislative modifications the VA has inundated colleges and universities with dozens of circulars and hundreds of pages of regulations. These regulations increase the burden of reporting procedures and perhaps most importantly infringed on academic and administrative policies of our institutions by substituting the VA's judgment

for that of the institutions.

Some specific examples will give you an appreciation of this "Veterans Mess" (the title of an article by the president of the American Association of Community and Junior Colleges, in the Community and Junior College Journal).

1. On September 9, 1975, the Florida State Approving Agency, on behalf of the Veterans Administration, required colleges and universities to establish standards of progress procedures for their approval. The guidelines required notification to the VA within 30 days that a veteran student has ceased to attend or should be dropped for lack of academic progress. Institutions were also required to establish additional standards of academic progress for veterans which included recalculation of cumulative grade point averages giving 0 quality points to veterans for incompletes, withdrawals or auditing. The averages of other Miami-Dade students were not computed in this fashion, and should not be. The best example of this problem is the incomplete which is frequently used at end of term for time variable instructional programs and <u>will</u> eventuate into a grade of A, B, C, D or F. It is clearly not an F which is the effect of awarding 0 quality points. What is illustrated is both an unwarranted invasion of College academic decision making and a gross misunderstanding of instructional programs.

2. Despite the heavy increase in administrative workload, the College agreed that to meet the imposed VA standards, class rolls (many College faculty do not take daily roll in class) should be annotated so that attendance of veterans

could be taken. Faculty were given the responsibility for notifying campus veterans coordinators when a student was "no longer pursuing his academic objective" either through lack of progress or failure to attend classes. The VA imposed standards for evaluation of veterans academic progress was initiated for the Spring Term, Academic Year 1975-76. One hundred forty-one students on the three campuses were reported and counseled due to unsatisfactory progress.

The College Veterans Affairs Committee evaluated Miami-Dade's compliance with the VA standards for academic progress during the first term (Spring 1975-76). It recommended six new computer programs in addition to the recalculation of veterans cumulative grade reports to assure full compliance for the Summer Term 1975-76 and for the Academic Year 1976-77.

3. As indicated above, the 1976 legislative modifications resulted in colleges and universities being inundated by the VA with hundreds of pages of new regulations. Among these was a requirement for each institution to revise the academic progress standards which had been approved earlier in 1976.

One regulation requires a veteran to repay all benefits from the first day of a course if he withdraws or receives an incomplete grade -- unless an explanation of mitigating circumstances is accepted by the VA. No longer will veterans cumulative GPAs be recalculated with "0" credits for withdrawals, incompletes or audits. Such grades automatically result in an overpayment and, therefore, a debt which the veteran must pay to the VA. This may encourage veterans to

opt for "Fs" to obtain benefits, while other students will receive "W" grades without jeopardizing their academic standing. Note that the veteran receives no additional benefit for taking morethan a 12 credit load. Why should they have to pay back something if, early in a term, they drop part of a 15-18 credit load? This further documents the VA's utter lack of understanding of academic programs. Thus, veterans will be judged by different academic criteria than other students (including recipients of other forms of federal aid) in the same course of study. This regulation adds a whole new layer of onerous record keeping which defeats the very purpose of being able to withdraw from a course without penalty. It rejects reliance on institutional judgment and policy and seeks to impose another layer of bureaucracy. Implementation of this regulation will increase overpayments -- veterans debts and eventually reduce veteran enrollment.

4. The VA concept of overpayments is that the institution is equally responsible for payment of the debt to the VA, if the college fails to report changes in student status within the 30-day period. Initially the first letter from the VA to a veteran advising him of an overpayment was addressed to the veteran and to the college. It was evident that the VA assumed that the overpayment was prima-facie evidence of reporting failure or false certification by the institution.

Such assumptions were based on VA regulations which claim final jurisdiction in determining an institution's liability to pay veterans debts. The college attorney who has been

informed continuously disagrees with the VA concept and advises that the U.S. Code requires the VA to prove negligence in the courts which, he adds is very difficult to prove. The State Director of the Division of Community Colleges, also disagrees with the VA concept. He maintains that the Constitution of the State of Florida does not allow the college to pay a student's debts. However, Miami-Dade has had only 25 students with alleged overpayment problems out of approximately 4,000 processed last year. In one community college in Florida, there are an alleged 1,200 students who owe over a million dollars.

Under the Articulation Agreement of the State of Florida a student is permitted to repeat courses to obtain credit after having failed the course previously. Under the VA regulations the veteran student who repeats the course in which he had received an "F", will automatically be billed for an overpayment for the repeat course.

Bitter and critical comments from officials of schools regarding the VA concept and the VA Form letter resulted in the Regional Office recommendation to the VA Central Office that the VA unpopular position be abandoned. The Region suggested that in the future a dictated letter outlining the facts of the individual case or cases should inform the schools of potential liabilities. Since that recommendation on September 1, 1976, there has been little or no follow up on the alleged 25 overpayment problems of Miami-Dade students.

5. The VA's interpretation of the new law requires institutions to evaluate academic progress of veteran students each semester regardless of institutional policy or practice. Analysis of transcripts requires not only the computation of credits, but also determinations of which courses satisfy program requirements, and whether veterans progress will permit graduation within the approved length of the course. Failure to meet the VA standards instead of college standards results in loss of benefits. According to the Vice President for Governmental Affairs, American Association of Community and Junior Colleges, less than 50% of the students attending four year institutions graduate within four years. A study of the completion rates at Miami-Dade for the Fall Term 1976-77 indicates that the completion rates for VA students is comparable with rates for all students for the College as a whole (68% for veterans - 69% for all students).

6. The VA restricts students' benefits in various academic programs, such as Independent Study courses, Open College courses using television; and in the case of radio-based courses, they provide no benefits at all to veterans. As an accredited institution, the College's position is that these courses of study are in all ways equal to existing on-campus courses of study, and it is not a logical educational decision to prohibit veterans from participating in these courses. In fact, the College has more documentation of quality in these courses than in any other. Research reports conducted at the College year after year substantiate the fact that the Open

College program in terms of learning achievements and educational standards is comparable to on-campus courses. This restriction is even more absurd, when you consider that programs like Open College are designed to serve adult needs in more convenient ways so that they can maintain their jobs and family responsibilities by participating in a large portion of the study in their own homes or on their own time schedules -- a decided advantage for many veterans.

The VA regulations forced Miami-Dade's very successful Life Lab program to adjust its time schedule to comply with the VA's interpretation of how much "on-campus classroom time" was necessary in order for the veterans to qualify for full benefits. This is another example of direct intrusion into the academic decisions of this College.

7. One other controversial issue, the "85/15" rule, prohibits education benefits for courses in which more than 85% of the students are G.I. Bill beneficiaries or Federal grantees (Basic Grants (BEOG) and Supplemental Grants (SEOG).) Initially the G.I. Bill included this "85/15" rule to prevent proprietary colleges from exploiting veterans benefits for higher education. However, the extension of the "85/15" rule to all colleges and universities in the Educational Amendments of 1976 and in subsequent VA regulations was without foundation. It is indeed possible for individual course sections, especially in urban community colleges, to have 85% of the students with federal aid. One can recognize the reporting system that would have been required to check every section (4,000 or more a term) for

student composition to make such a judgment. The result was such a furor of complaints and court cases that the VA waived the requirement for institutions with no more than 35% veterans in courses. In South Dakota a Federal judge ordered the VA to halt enforcement. The VA also extended the enforcement of the portion applying to federal grantees of BEOG and SEOG until July 1, 1977. Should the rule be implemented fully on July 1, 1977 as currently authorized, the increase in record keeping and reporting to the VA will be increased significantly.

8. Two years ago the Florida Legislature provided an automatic 60-day fee deferral for all veterans attending institutions in Florida. This legislation resulted in heavy financial losses to the College due to nonpayment of deferred fees. The instructions from the State Department of Education were not clear. As a result the legislation was taken literally to require a 60-day deferment for each term requested by the veteran, even though many of the veterans receiving deferments were delinquent for previous terms. Some students dropped out. However, there was little collection activity in view of the lack of guidance from Tallahassee.

Last year Miami-Dade revised its system upon receipt of specific guidance from the State Department of Education. A student who was delinquent on one deferral was not authorized another. As a result, many students were dropped for failure to pay the 60-day deferrals. For the Fall Term 1976 the South Campus dropped 63 veterans and the New World Center Campus dropped 40 veterans for nonpayment of deferred fees. The

following term (Winter 76-2) South Campus dropped 71 students and the New World Center Campus dropped 43 students for non-payment.

The Florida Legislature has now passed a new 60-day deferral bill which will require only one deferral per veteran student per academic year. The student may request the specific term but he is required to sign a promissory note, the form of which is included in the bill. When veterans receive prepayments or advance payments, they are not eligible for the 60-day deferral. These provisions should greatly reduce Miami-Dade's annual losses due to nonpayment of deferred fees.

At Miami-Dade, campus officials have kept veterans fully informed of the new restrictions which can adversly affect G.I. benefits, through correspondence and counseling. During the past year we lost 1,100 veteran students. Approximately 800 were Korean War veterans whose eligibility expired on May 31, 1976. The remaining 300 enrollment loss we attribute to the new legislation and the discriminatory regulations of the VA. Should the VA infringement upon institutional prerogatives be allowed to continue we predict significant losses in veterans enrollment.

Such is the adversary relationship which the VA has developed with colleges and universities who are serving Vietnam veterans. However, we hope that this "Veterans Mess" will not continue. The new regulations have generated 25 lawsuits to date. Furthermore the constant pressures of institutions, educational associations and individual educators on U.S. Congressmen is expected to produce: (1) corrective legislation by the U.S. Congress, and (2) modifications of recent regu-

lations by the Veterans Administration. Letters from the College president to key senators and congressmen have addressed the specific problems, the need for relief and have proposed acceptable alternatives.

The Government Accounting Office (GAO) in a survey requested by the Chairman of the Senate Committee on Veterans Affairs, has revealed that the Administration's refusal to commit $30 million to provide colleges with Vet-Reps (ratio 1 for each 500 students) is a major factor in the VA's failure to "properly" administer the G.I. Bill Program. It was the intent of Congress that Vet-Reps, as direct representatives of VA Regional Offices, would resolve the numerous problems of alleged overpayments, student unsatisfactory progress and lack of attendance.

The above report is current through June 1977.

HISTORY OF VETERANS ADMINISTRATION REQUIREMENTS FOR STUDENTS ENROLLED IN LIFE LAB PROGRAM

Life Lab is a division of Miami-Dade Community College, operating county-wide out of the New World Center Campus. It offers an innovative educational program for adult students, including "contracting" for learning packages and some self-directed study. It provides substantial interaction with staff and more individualization than most of our programs. For certain adult students it has proved especially effective.

Since its inception in 1970-71 Life Lab students had received Veterans Administration benefits as a bona fide division of the College. On December 24, 1974, the Veterans Administration changed its Regulations 14270 and 14280, regarding what it called independent study programs. On February 25, 1975, the New World Center Campus registrar received information that Life Lab would no longer be approved by the Veterans Administration. Life Lab was considered independent study and a student could receive no more than 50 percent benefits. At that time over 400 Life Lab students were veterans.

The Division Director of Life Lab spent many hours collecting and forwarding material to the Veterans Administration to show that Life Lab was not an independent study or correspondence program in the traditional sense--and it is not. In Spring of 1975, a member of the Veterans Administration approval team visited Life Lab and asked questions about the program. On June 30, 1975, the College learned that approval had been denied.

Students were notified. There was understandable protest. On July 24, 1975, the students held a mass meeting and demanded that something be done. They felt that the Veterans Administration was arbitrarily

imposing its ideas of educational process. With no real choice, the group voted at that meeting (which over 300 veterans attended) to try to amend the program to meet all Veterans Administration standards.

With this revision Life Lab students taking a full course load (12 credits) were spending over 50 percent of their time in a traditional classroom setting. These changes had to apply to all students, since it was not practical to operate two forms of the program. Clearly, the Veterans Administration's view that the only way to learn is to sit on chairs in a class setting for a specified time, forced the College to change a successful program so that veterans could continue to enroll.

On July 29, 1975, the acting Director of Life Lab and the Campus Vice President met with officials from the Veterans Administration and the Division of Community Colleges. The Veterans Administration agreed that Life Lab, in its new design, had met all requirements and gave Life Lab provisional approval. (Remember that the College is reviewed and accredited by the regional association and the State of Florida.) The College was asked to submit a letter seeking approval and listing our classes, times, locations and instructors prior to the beginning of each semester. The Life Lab Division is still doing this as well as monitoring attendance and keeping voluminous records.

This Veterans Administration matter took hundreds of hours during that Spring/Summer. Continuing the requirement takes many hours of instructors' time, even today.

The program became more structured because of the requirements. In order to cater to the Veterans Administration, Life Lab lost students who needed more program individualization. Instructors lost much of their freedom to contract flexibly with students. Attendance and the

number of hours spent in a classroom became increasingly the focus for students, instead of learning. Since that time, enrollment in this program has continued to decline.

STATEWIDE COURSE DESIGNATION AND NUMBERING PROJECT

History

The basic concept of the Course Numbering System was conceived by the Florida Association of Collegiate Registrars and Admissions Officers (FACRAO) in the early 1960's. During 1971, the concept of a numbering system was adopted by both the Community College Council of Presidents and the State University System. A common course numbering system formula and system logic were provided to state community colleges and universities from the State Department of Education in order for each institution to develop uniform course numbers. In August, 1971, a joint Community College/Upper Division Ad Hoc Committee was established for the purposes of maintaining and expanding the course numbering system. This group found extensive inconsistencies and misunderstandings concerning common course numbers as well as noncompliance on the part of many institutions. Thus, a Statewide Committee on Common Course Numbering was appointed in December, 1971 within the State Department of Education to completely review the status of common course numbering. It was decided that common discipline formats should be developed within the basic logic and principles previously established. Faculty members appointed to discipline task forces would then review all higher education courses in Florida and assign a common course abbreviation and number.

Miami-Dade Community College was offered a state contract to develop a basic working document for the discipline task forces which consisted of an inventory of all higher education courses in Florida (approximately

45,000 individual courses). This project was accomplished by the Office of College Admissions and Records Services. This inventory created the initial base for the launching of this challenging and extensive undertaking - unique in Florida and probably anywhere in the United States. During the next few years approximately 110 task forces, comprising 600 faculty members from 9 universities, 28 community colleges, 26 area vocational schools, and 7 private colleges and universities met and developed the complete course subject taxonomy for each area and individual course.

Acting upon the original directives and deadlines of the Division of Community Colleges in 1971, Miami-Dade assigned new prefixes and numbers to all its courses according to the guidelines provided and incorporated these new course abbreviations and numbers within the college catalog. The college was in the process of implementing a new student data base and programming was completed to incorporate these new course abbreviations and numbers in the college's computerized registration and records systems well within the time periods provided. The conversion to the new abbreviations and numbers was accomplished with the assistance of minimum staff and resources. During this period, the college was represented on the Statewide Course Numbering Committee by the Vice President for Occupational Education.

An abrupt change in direction occurred in 1973. It became evident when developing taxonomies for all courses, the logic used to develop the numbering system to this point was inadequate to handle the many variations of the same or similar courses within the state. It was, therefore, necessary to develop new logic to expand the numbering system from six digits to seven digits, plus suffix. Implementation of

the existing course abbreviation number within the catalog, transcripts, registration and reporting was held in abeyance for those institutions who had not already converted. For those who had changed, it was evident they would be required to change again after previously complying with all initial requirements. Miami-Dade Community College was in this category.

As a result of this change, new requirements were imposed by the state numbering system project, necessitating major adjustments by Miami-Dade to conform, including programming revisions to the student records systems to accommodate the expanded number, modification of all programs and reports using course abbreviation and number, as well as new forms design and purchases.

During 1974-75, the Florida Legislature declared the completion of the Common Course Numbering System to be a "high priority". The 1976 legislature provided these implementation dates: for the Fall Term 1976-77, automatic transferability of all undergraduate courses was to begin (to the extent numbers had been finalized). During the Winter Term, 1976-77, the automatic transferability for all the undergraduate courses was to begin. During March, 1977, the course equivalency profiles for all undergraduate courses was to be completed.

Present Situation at Miami-Dade Community College

Miami-Dade Community College has contributed considerable time and effort working to comply with the requirements imposed by the new Common Course Numbering System. The requirement to implement a six digit state numbering system in 1972, and then change again to a seven digit number by 1978, has impacted college resources to a considerable extent.

To begin the implementation phase of the project an ad hoc committee

was appointed by the College-wide Registration Committee to investigate all areas requiring modification in order to incorporate the number system and coordinate all necessary modifications to the registration, permanent record and fee payment systems. This review determined there were two major areas affected by the implementation of the new Common Course Number System. These areas are:

College Catalog and Forms Design: Beginning with the 1977/78 year, the college catalog must be reformatted to include the new course numbers as the primary indicator. Beginning with the Fall Term, 1978, all forms using course abbreviation and number must be revised and reprinted.

Computer Systems Modifications:

1. Major modification will have to be made to the "on-line" computer systems and computer terminal screens. Estimated conversion time is six man months.
2. Major modifications are also required to systems not dependent upon tele-processing.

   These areas include:

   a. Student records maintenance and state FTE reporting.
   b. Faculty assignment system
   c. Transcript system
   d. Cost Analysis system
3. Virtually every program using course abbreviation and number must be modified.

Estimated conversion time for 2 and 3 above is six to eight man months.

Miami-Dade Participation in the Development of the Common Course Designation and Numbering System

Miami-Dade Community College was represented on the original Statewide Steering Committee beginning 1971 by Dr. Theodore Koschler. Dr. Koschler served until his retirement. During the entire developmental stage, Miami-Dade Community College faculty served on many of the 110 discipline task forces, notably in the technical/occupational fields as well as health related areas. In 1976 a Statewide Course Numbering Policy Council was established to monitor the implementation of the system, maintenance, and its continuing refinement. Miami-Dade is represented on this council by Mr. Douglas E. Matthewson, Jr. and Dr. George Mehallis.

Purposes of the Common Course Number System

The purposes of such a system are as follows: (1) provides a common classification system for all disciplinary and interdisciplinary categories and subcategories based on the professional judgments of the faculty; (2) provides a complete and reasonably accurate inventory of all postsecondary courses and programs; (3) provides a matrix of all institutional offerings in each disciplinary and interdisciplinary area based on subject matter; (4) provides an integral element of the state's management information system and program, planning, budgeting and evaluation system; (5) provides a basis for program allocation among the several sectors; (6) provides a basis for formulating rationales for alternative programs within disciplines so that unwarranted comparisons will not be made; (7) provides a basis for the effective and efficient use of limited resources and for the equitable funding of programs; (8) provides an unparalleled forum for statewide articulation; (9) increases

the effectiveness of admission officers, registrars, academic and career counselors, teacher certification personnel and placement and follow-up officers; (10) provides for high school counselors in one document complete information concerning the variations in offerings in different postsecondary education discipline departments and institutions; (11) facilitates the comparison by students of the nature and scope of varying institutional programs; (12) minimizes the frustration of students resulting from institutional errors in transcript evaluation, program planning, and advising; (13) provides for faculty a communicative device for identifying any lack of comparability between community college offerings and lower division university offerings; (14) provides for trustees and legislators a clearer and more accurate framework from which to assess the current status and direction of postsecondary education.

STATE OF FLORIDA RECORDS RETENTION SCHEDULE

This report is provided to illustrate the time drain for decisions that were once handled in a simple and direct manner. It is also noted that this system does not recognize a micro form copy as a record. This has added significantly to the paper storage problem at the College.

When the College begins to destroy records under this approval schedule, a second and perhaps equally time-consuming procedure must be followed. This procedure consists of submitting a notice of intent to destroy, schedule review form indicating records to be destroyed, inclusive dates and quantity of records (in number of drawers or cubic feet of volume). Following approval from the Division of Archives, the distribution method and date must be indicated, certified and witnessed. This form is then returned to the Division of Archives for the second time. An example of State regulatory and MDCC difficulty concerning records retention and disposal follows:

On August 25, 1977, the College received a copy of the approved record retention and disposal authorization schedule as approved by the Division of Archives, History and Records Management of the State of Florida, Department of State. The Archives Division made several amendments to our destruction procedure. The College responded with the following concerns:

(1) Item No. 1, General Correspondence, the student deans at Miami-Dade prefer to maintain records for five years, not three; (2) Item No. 7, Confidential/Student Records (Nondisciplinary), it was indicated the student deans wished to keep these types of records for ten years, not

three; (3) A retention schedule based upon a number of years after a student graduates was not applicable to Miami-Dade. We indicated that many of our students drop in and drop out based upon personal objectives and are not interested in graduating. It was, therefore, necessary that a destruction schedule be based upon a specific number of years after an incident took place or a file was created; (4) We questioned the "Note" at the bottom of page three of the schedule. It was our intention that whenever a discipline folder is destroyed that the tape recording also be destroyed at the same time.

The Archives Division agreed to modify the approved retention schedule to relieve some of the concerns of the student deans; however, upon receiving these modifications, concern was still evidenced with the State approving a shorter retention period than the College feels is necessary.

On August 30, 1977, a telephone response was received to our inquiries. Following additional conversation with the Division of Archives, they then indicated on September 1, 1977 the College could retain records for longer periods than that approved in the retention schedule, but that we would be allowed under law to destroy records after the approval time period.

It would appear to us that the amendments to the retention and destruction schedule as agreed upon by the Division of Archives will conform to our College procedures. We do believe, however, that an amended form or a letter from the Archives confirming all these changes should be someplace on the official record.

The steps in this sequence were as follows:

1. The College established a schedule consistent with College

policies and procedures, placed this on the proper forms and submitted it to the Archives Division.

2. The retention schedule was returned with different time schedules than requested.
3. A series of phone contacts was instituted to straighten out this matter.
4. Following appeal, the College will be able to proceed the way requested although at the moment nothing has been received from the Division indicating these modifications. Such a letter has been requested.

If the College has not raised any objections, this could very well have been a case of the State dictating Miami-Dade's record destruction policies. Does this Division of the State in fact have such authority? Is a State agency preempting the authority of the District Board of Trustees in a local administrative matter developed by educational professionals? A review of this authority and regulatory practice would seem to be in order.

THE IMPACT OF PLACEMENT AND FOLLOW-UP REQUIREMENTS

Overview

Effective July 1, 1970 the Florida Legislature enacted a statute which empowered the State Board of Education to adopt regulations which instructed the community college to evaluate occupational education programs provided within its curriculum and instructed the Board to adopt the necessary procedures to determine the extent to which minimum requirements of the legislation were being met. Minimum requirements included standards of educational output with particular emphasis on job placement and satisfactory performance in employment. The Division of Community Colleges then developed an extensive series of guidelines which individual colleges were to follow to assure compliance with the intent of the legislation.

These guidelines represented a considerable expansion on the original legislation with much detail in the areas of definitions and prescribed methods of data collection. The broad scope of the regulations generated resistance from the institutions for various reasons. The most prevalent difficulty was, and is, lack of money and attendant resources necessary to provide compliance. For the State Legislature, while mandating these studies, did not allocate the monies necessary to support this research on program development.

Another more philosophical objection raised was that the guidelines required the evaluation of each program of study in terms of "performance based education." There were no performance based programs that would comply with the regulation in place. It was estimated that to comply

with this regulation alone would cost several times the financial burden needed to fulfill the requirements for follow-up studies. The fact that tracking was mandated for every student who completed every year also came under criticism. Many college personnel believed that such exhaustive data were not necessary for judicious decision making. Research consistently demonstrated the value of sampling methods, which would be financially feasible.

When considering the immense difficulties confronting Miami-Dade Community College in attempting to comply with the regulations (with more than 60,000 credit students) it should be remembered that the intent of the legislation was to provide not only the State with information, but the College as well. The follow up information would be valuable to the College since it would provide additional input to the program directors related to the effectiveness of their programs in serving student and community needs. If this portion of the program could be done in a practical way, it would be worth the expenditure.

Specific Problems

The Placement and Follow-Up Report in the format evolved by the Division of Community Colleges, is comprised of three separate sections, Phase I, Phase II and Phase III. The first section, which is due August 25 of every year, consists of a report of program enrollments and completions. This is required on a program by program basis (at Miami-Dade there are 164 programs). Also required is a breakdown of these enrollments and completions into sex and ethnic groups. For Miami-Dade Community College, Phase I represents approximately 100 separate forms which have to be completed. While filling out the forms is primarily a clerical task, it does nonetheless encumber a portion of the colleges operating funds for the staff time as well as for the computer operations necessary to produce these data. A special computer program was required to extract these data from the files in the format required by the State Division of Community Colleges. Initially, a special computer program had to be processed on an emergency basis because the State did not inform the College of the necessary data and format requirements until the initial due date of the report was close at hand. An institution the size of Miami-Dade has many operating requirements dependent on the use of high speed processors, and the origination of any emergency request of this nature results in other necessary projects being delayed.

Phase II of the Placement and Follow-Up Report, due March 1st each year, consists of categorization of the graduates reported in Phase I based on their placement status. The graduates must be classified in one of seven groups;

A. Employed full-time in field trained or related field.

B. Other full-time employment (not in related field)

C. Continuing Education

D. Employed part-time (less than 30 hrs/wk.)

E. Unemployed-Seeking Employment

F. Not available for placement (by choice)

G. Placement status unknown

This information is almost impossible to obtain for all individuals involved. In order to be able to classify each graduate, individual contact must be established, and is typically attempted through the use of a mail survey. This procedure necessitates the involvement of various professional members of the College to develop an appropriate survey instrument. These professionals must take time from their other duties and assignments in order to devote some energy to this new task. There is also the additional use of supplies, paper, duplicating and mailroom operations to be considered. In 1976 nearly 2,000 surveys were mailed to graduates of Miami-Dade Community College, of which 50% were returned in a usable condition. This rate of return has implications for decision making. The rules require that the exact number of placed students be reported rather than the proportion of respondents, and it then becomes likely that any decision based on these data will then reflect a judgment for which only half the data has been evaluated.

Part 2 of Phase II consists of reporting of the number of persons who left a particular program and entered another program in the college,

and those students known and assumed to have withdrawn from the program and the college. Since so many of our students study part time over several years, dropping in and out, we are convinced that the data produced as required, are completely meaningless. The extensive use of computer facilities is also required when producing this information. Part 1 and Part 2 of Phase II are reported in the same format as Phase I; that is on a program by program basis with the data broken down by sex/ethnic groups. While not all programs offered by the College graduate students each year, a majority of the programs do, which necessitates a final report nearly the size of the Phase I document.

The third part of the Placement and Follow-Up Report, or Phase II, is due May 1st of each year. It consists of summary counts of the number of students contacted for follow-up and withdrawal studies (on a program by program basis broken down by ethnic and sex groups). To complete this phase of the report, follow-up and withdrawal studies must have been completed during the previous academic year. Due to the nature of follow-up and withdrawal studies, elaborate and reliable contact is needed with students, employers and other educational institutions. Once this contact has been established, interaction with the College's program directors is necessary in order that the information garnered from these studies may be utilized to assist the College in the evaluation of the effectiveness of its programs of study. The guidelines outline a procedure for withdrawal studies which is similar to that presently used by the College for an Equal Access/Equal Opportunity Study. However, even though this study has the operational and financial support of all campuses, including the research offices, clerical staff, and mailroom operations, it still requires six to eight months to complete. Before the establishment

of Placement and Follow-Up regulations by the Division of Community Colleges, Miami-Dade Community College undertook a study which was the type necessary to fulfill the requirements for a follow-up study. On a one time basis this research required one and three-quarters man years to complete by the College staff, as well as employing outside consultants. Even though the cost to the College for the complete study was in excess of $35,000 it represented an effort considerably more limited than subsequent regulations prescribed.

The regulations state that placement services shall be provided by the community colleges and shall be so designed as to provide information that will enable the college to adjust its instructional programs to meet the employment needs of students more fully. The implications of this portion of the regulations are that those persons who are now engaged in the placement of students in employment or Upper Division Universities, would have to redirect a significant portion of their energies to keeping records on these students, which would result in a lowering of the efficiency of the placement services. The alternative is to hire additional staff members in the placement offices to act as data collectors. The guidelines also extend to the evaluation of support programs such as learning resources and counseling. The attendant difficulties mentioned above for the evaluation of placement services also apply to these areas.

The State also mandated performance evaluation of former students assessed against the particular goals and objectives established for the respective instructional programs through which those students were prepared. Performance based program evaluation is nearly impossible on such

a grand scale, since there is little information to fulfill this requirement. Combined with the philosophical problem defining programs based on performance criteria, there is the practical difficulty of maintaining the extensive contact with the student, employer or other colleges which is necessary to comply with this portion of the regulations.

Compliance with Placement and Follow-Up regulations necessitates flexibility by the College in meeting the constantly changing guidelines governing the content and format of data to be presented to the State. Due to the size of the student population at Miami-Dade Community College, it is absolutely necessary that these reports utilize computerized files. Currently, a five month notice is required for the computer programming staff to accommodate major changes in, or the origination of a program. This obstacle may be partially overcome by the initiation of emergency programming requests, but this procedure is often disruptive of the programming department, and delays the completion of important requests from other areas of the College. Even without the use of an emergency programming request, the addition of another programming requirement increases the load of the staff beyond a reasonable level, with the result that other programs which might be more useful to Miami-Dade Community College, have to be rescheduled for completion at a later date.

When one considers these and other difficulties with the Placement and Follow-Up Report they take on a perspective of higher impact when it is considered that this report must be filed every year for very large numbers of students.

Specific Cost

Getting the necessary information takes people, time and money. In October of 1975 at the direction of the President of the College, the Director of Institutional Research, Dean of Administration and the South Campus Vice-President jointly estimated the cost of follow-up and placement systems for students at Miami-Dade Community College. The personnel and cost estimates for District Administration and one campus is as follows:

DISTRICT REQUIREMENTS

One full-time programmer	$ 10,000
One full-time research person in the Office of Institutional Research to devote full-time efforts to initiate, coordinate and implement the system	15,000
One full-time paraprofessional to coordinate the elaborate contacts needed with students via both questionnaires and classroom	8,000
One full-time clerical person	7,000
Professional and non-instructional staff involvement in such matters as mailout of questionnaires, reproduction of materials, keypunching, etc.	35,000
Materials: mailing, duplicating services	10,000
DISTRICT TOTAL	$ 85,000

SOUTH CAMPUS' REQUIREMENTS

Two professionals to man fully operational placement office	30,000
Clerical support for the placement office	14,000
Campus supplies—forms, etc.	2,000
One professional researcher to design and monitor campus placement follow-up and data collection on the campus level, plus clerical support	21,000

One professional to coordinate campus performance based program outcomes project, plus clerical support	$ 21,000
Professional to assist AA students in college placement	12,000
SOUTH CAMPUS TOTAL	$100,000*
The extrapolated figure including all campuses	250,000
Each of these persons will need space, phones and other accounterments associated with full-time persons	
The estimated total annual cost, institutional requirements plus campus requirements	335,000

* Based on South Campus figures

It should be noted that these cost estimates do not include computer time or computer programming, which is an essential part of the placement and follow-up system at Miami-Dade Community College. Nor do these cost estimates reflect the loss of time due to the redirection of efforts by any of the present staff and faculty of the college.

Conclusion

In 1970, statute empowered the State Board of Education to generate regulations which required the community colleges to track graduates. The Division of Community Colleges interpreted this legislation through a series of guidelines and regulations, which attempt to carry out the letter and the spirit of the law. Overall, it is recognized that there is no basic objection to placement and follow-up studies of this nature recognizing the fact that this information can prove to be a useful management tool. However, the broad scope and the annual reports required

by the regulations seem unnecessary. At this time, it seems that full and complete compliance with the State Department of Education regulations regarding Placement and Follow-Up is not possible for Miami-Dade due to lack of personnel and other facilities. The current staff would have to be expanded in order to approach compliance, but in the seven years since the inception of Placement and Follow-Up legislation, there has been no funding by the State to support these requirements. The College has had to draw upon its existant resources in order to supply the information it has. This is a situation which has resulted in partial compliance with regulations.

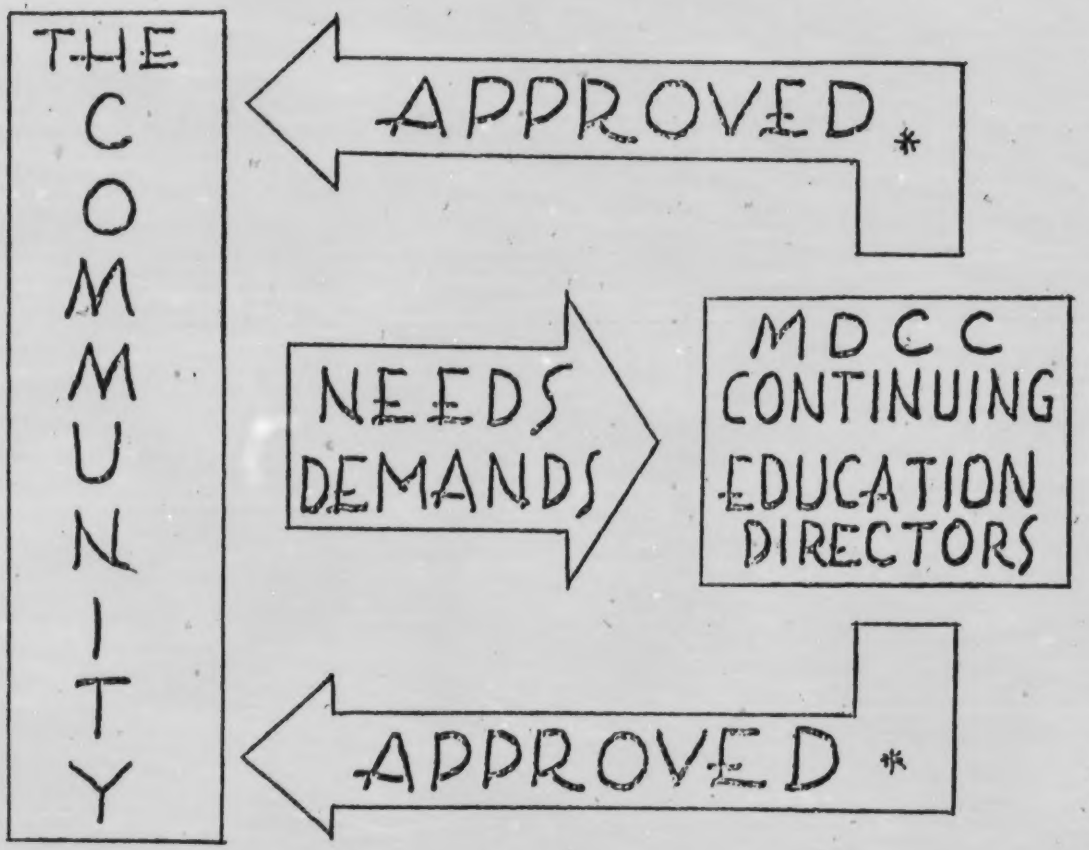
The intent of the original legislation was to provide information concerning the performance of former students on the job, and at other educational endeavors. The collection of Placement and Follow-Up information is designed to provide data which will allow the institution to adjust insufficiencies, and more fully serve the needs of the students in their attempts to achieve educational and vocational success. At present it is possible to supply only a small part of the required information. To achieve total compliance, Miami-Dade Community College faculty and staff would have to redirect a substantial portion of their energies away from their primary job responsibilities toward Placement and Follow-Up efforts. The other alternative lies with the State, and that is to reduce the broad scope of the Placement and Follow-Up regulations, or to allocate money specifically for the gathering and reporting of the data.

COMMUNITY INSTRUCTIONAL SERVICES PROGRAM

Prior to 1975, the decision to offer non-credit Community Instructional Service courses by Miami-Dade Community College was the perogative of each campus, with the Director of Continuing Education Division on each campus signing off as the final authority. (See Figure 1) These courses were categorized by the state.

A State Board of Education Regulation (6A-14.91) promulgated November 1975 set forth a series of rules and a process that each community college was to follow in offering non-credit courses in community instructional services. This required the development of a study to identify community problems in Dade County in six specific areas. They are: environment, health and safety, human relations, education and child rearing, government and consumer economics. This study had to be conducted by the College and approved by the governing board, the district board of trustees. Once approved by the governing board, this had to be forwarded for filing to the State Department of Education. Each course offered had to be designed to "solve" one of the problems identified in the study. Further, each course offered had to have prior approval by the Division of Community Colleges at the State level. (See Figure 2) This state course approval form identified course number, title and description, specific target groups served, assessed need of target group, specific community problem this course addressed, how course will aid in resolution of the problem, and other internal administrative fiscal concerns. Only thirty-one courses were approved for offering during the 1975-76 college year.

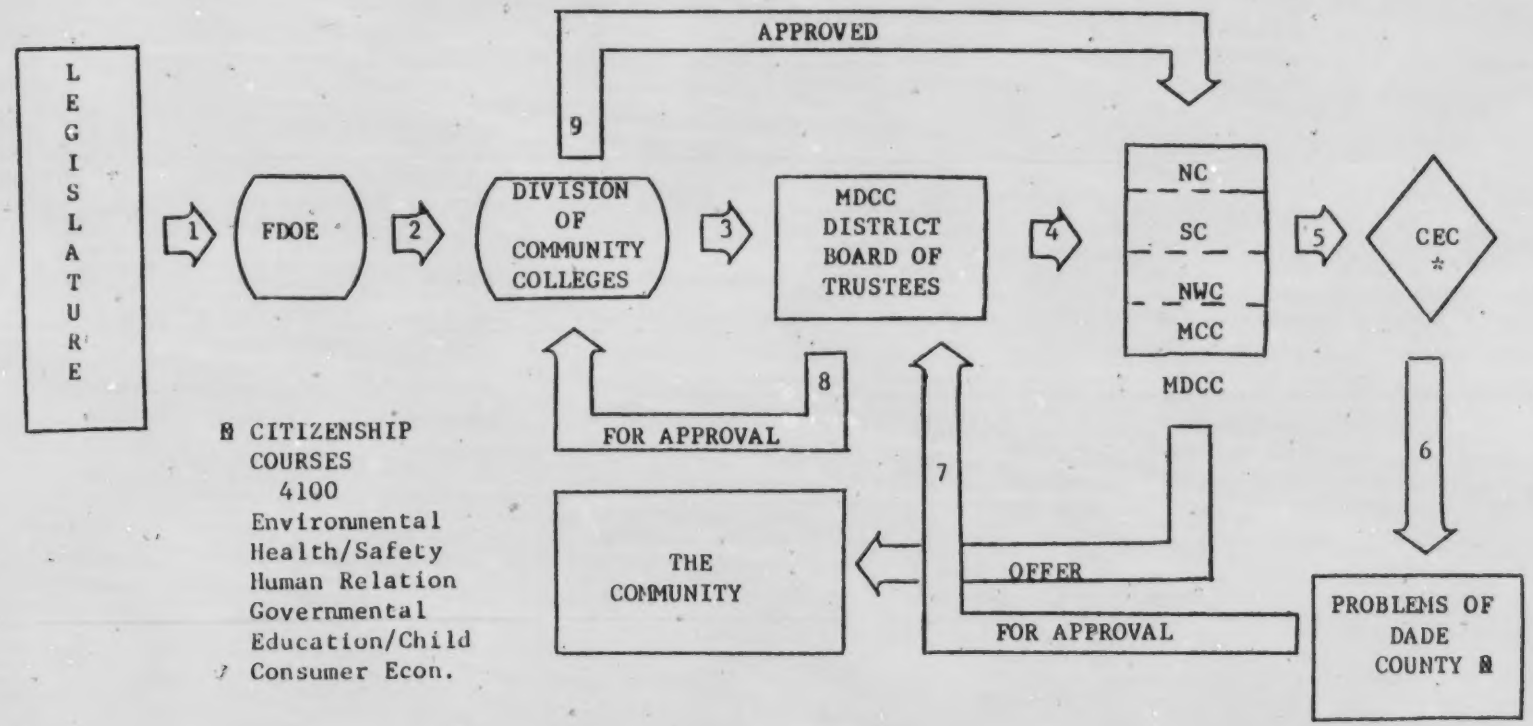
Figure 2 graphically shows the added complexity of the new system.



*COURSES: OCCUPATIONAL/VOCATIONAL, DEVELOPMENTAL, AVOCATIONAL/RECREATIONAL, COMMUNITY INSTRUCTIONAL SERVICES

FIGURE 1

PROCESS FOR IMPLEMENTING COMMUNITY INSTRUCTIONAL SERVICES PROGRAM
SBR 6A-14.91 1975



*MDCC Continuing Education Committee

7/21/77

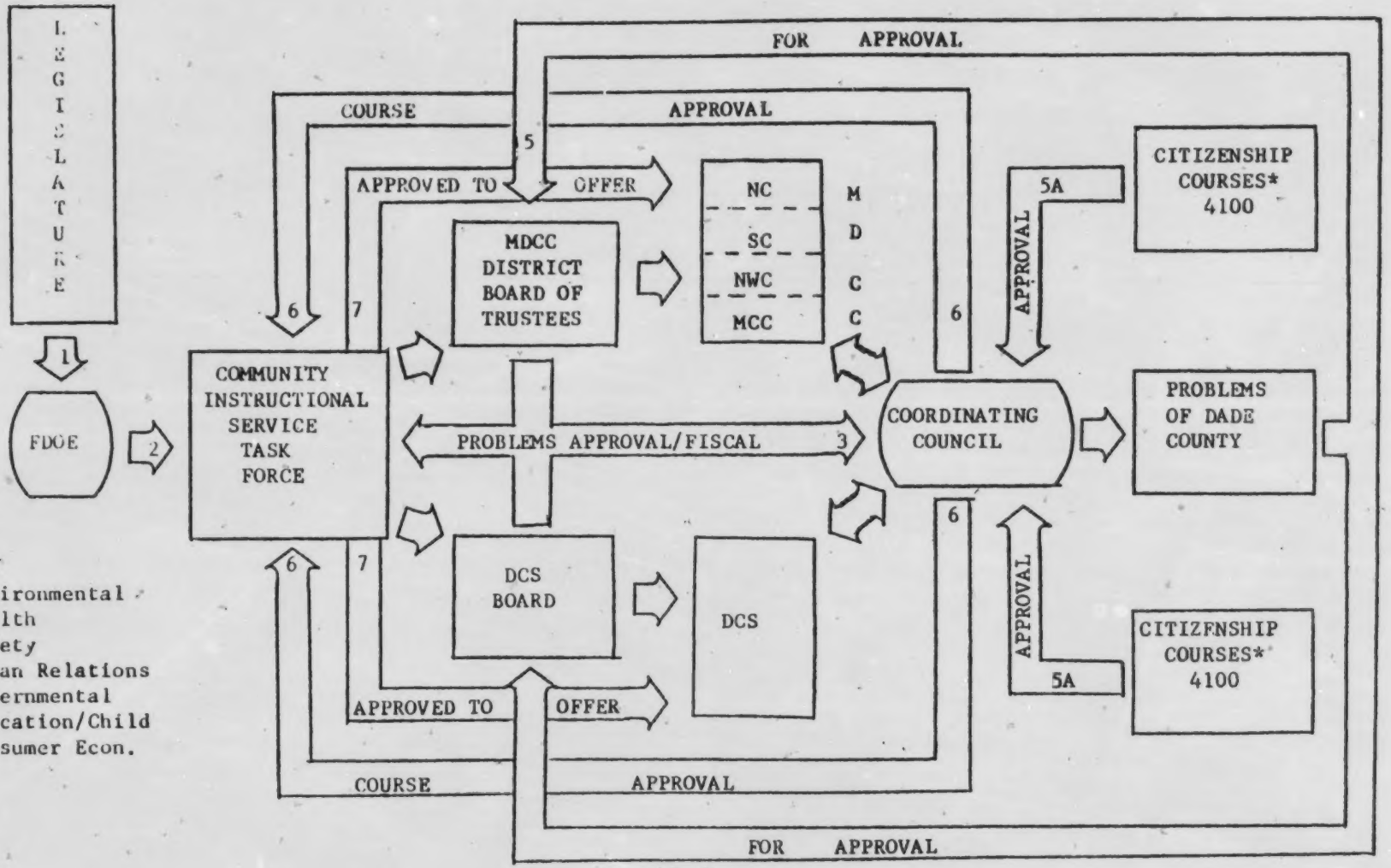
FIGURE 2

In October 1976, a new rule (6AER 76-8) set forth new eligibility guidelines for funding community instructional services programs. Each course must be justified on the basis of the expected contributions it will make to the identification and solution of the community problems identified in seven defined areas. The identification of these selected problems involved a joint effort by Miami-Dade Community College and the Dade County Schools through the local regional coordinating council for vocational education, adult general education and community instructional services. Once this joint effort was completed, it had to be approved by the respective governing boards of these two local educational agencies and filed with the State Department of Education.

The course approval forms submitted by each educational agency were first prioritized and approved by the council, signed by the chairperson of the council and transmitted the recommended courses to the State Department of Education for approval for offering by Miami-Dade Community College and the Dade County Schools (See Figure 3).

The 1976 Florida Legislature appropriated $2,300,000 to be used for community instructional services on a course by course basis, as opposed to previous funding arrangement. The aforementioned rule contained the provisions necessary to implement this appropriation through a prescribed formula, allocating funds to each of the twenty-eight (28) regions in Florida. The amount of funds actually distributed to each community college and to each school board in each of the twenty-eight (28) regions is based on the activities recommended by the regional coordinating council to be conducted and funded from that region's allocation. Each community college, school district and regional

PROCESS FOR IMPLEMENTING COMMUNITY INSTRUCTIONAL SERVICES PROGRAM
SBR 6A-10.27 1976-77



*Environmental
Health
Safety
Human Relations
Governmental
Education/Child
Consumer Econ.

GM 7/21/77

FIGURE 3

coordinating council filed with the State Department of Education reports prescribed by the commissioner of education.

Since the advent of these state regulations in 1975, Miami-Dade Community College has had to appoint a formal college-wide Continuing Education Committee in order to cope with implementation of the state regulations set forth. Two additional members from the college's continuing education division were appointed to the regional coordinating council because of its involvement in the overall process. It is virtually impossible to estimate a realistic cost factor incurred by the college in terms of individual man hours, committee meetings, surveys, in-county travel, secretarial, clerical and computer services. If a cost analysis was feasible, the effort put forth could well outweigh the dollar return for this very small part of our educational program compared to our autonomous campus system prior to 1975.

Among the undesirable results has been the inordinate delay for the full approval system and the funding of selected courses, so that where there are two sections, one might be funded and students pay a fee of $5, while the other might not and students would pay $15 to $20. This can also occur from term to term. All of this, as shown in Figure 3, was created to "coordinate" decision making. It has reduced enrollment and confused citizens while adding significant costs to the institutions.

OCCUPATIONAL ADVISORY COUNCILS

Probably one of the most time consuming and frustrating activities for occupational administrators of post-secondary programs is the compliance and adherence of federal and state regulations regarding advisory committees. In the past the use of local advisory committees were strongly recommended for each occupational program or cluster of programs. A general occupational advisory council was also recommended to assist with the activities of the institution's total occupational programs.

Miami-Dade Community College has forty-six (46) advisory committees which greatly enhance the college's total educational program. Each advisory committee must be on file with the Director of Vocational Education of the State Department of Education. These forty-six committees reflect totally approximately 375 people from local business, industry and professions.

Title II of the Education Amendments of 1976, Public Law 94-482, states that each eligible recipient which receives federal funding assistance under this Title of the Act shall establish a local advisory council on vocational education. The Act mandates that the State Board notify eligible recipients of this requirement.

Section 104.111 Federal Register, Vol 42, No. 67, April 7, 1977, cites the regulation that the local advisory council shall be composed of representatives of the general public including a representative of Business, Industry and Labor. The council may be established for a program area, a school, a community or a region.

Each application for federal vocational funding assistance must contain the assurance that the eligible recipient has a local advisory council and that the council provided assistance in the development of the application.

COMMITTEE DEALING WITH EA/EO CONCERNS

CAMPUS _____ NAME OF COMMITTEE _____

Please list members' names below and check all appropriate columns for each member.	Retired	Administrator	Faculty	Professional	Career Service	Student	Black Female	Black Male	White Female	White Male	Hispanic Female	Hispanic Male	Other Minority Female	Other Minority Male	Handicapped	Industrial Representative

FIGURE 4

Complying with these regulations demands considerable paperwork, staff time and detailed records of each committee's activities. For example, the State Guidelines for Equal Access/Equal Opportunity (EA/EO) states that minorities, women and handicapped persons will serve on every external advisory committee. In each case where this is not feasible, we must show that we have made an effort to comply. Profile data for this phase of the institution's EA/EO report was gathered on a prescribed form (Figure 4) in May 1976. The institution is currently in the process of conducting a follow-up survey to determine whether or not the profile of these forty-six committees has changed and how well the institution is complying with EA/EO regulations.

In 1971, in order to better coordinate the activities of Florida's vocational education delivery systems, the State Board of Education, through regulations, required each of the twenty-eight (28) community college districts to establish a coordinating council for vocational education. As stated in the present regulations 6A-14.37 and 6A-6.67:

> "The responsibilities of the council shall be to review the total vocational education, adult general education, and community instructional services programs being offered in the district, to make such recommendations as are necessary, to encourage the development of needed offerings or changes in existing offerings and to avoid unwarranted duplication."

These regulations have imposed another hurdle in the program approval process of the institution. To illustrate, to initiate a new program, this process has lenghthened the time line, generated more paperwork and requires more staff time. Further, this regulation has imposed on coordinating councils a fiscal responsibility; that is, the distribution of the State Education Commissioner's discretionary funds for Community Instructional Services within each region. A

criteria and management system had to be developed to monitor these funds between the two local education agencies - the Dade County Schools and Miami-Dade Community College.

The occupational education sector of the college has also felt an impact of maintaining a coordination with the Local Manpower Planning Council and the "1202" commission authorized by Title X of the Higher Education Act of 1965.

IMPACT OF STATE AND FEDERAL REGULATION AND REPORTING ON THE COLLEGE PERSONNEL OFFICE

The Equal Access/Equal Opportunity (EA/EO) requirements and commitments have had substantial impact on the operations of the Personnel Department and, in effect, throughout the college. The requirements that provide the framework for our EA/EO commitments are: Title VII of the Civil Rights Act of 1964, Executive Order 11246 as amended by Executive Order 11375, the Equal Pay Act of 1963, the Age Discrimination and Employment Act of 1967, the Rehabilitation Act of 1973 and the Federal rules implementing this in June of 1977, and State Statutes and Rules relative to EA/EO for public employees.

Since these Federal and State laws and rules were enacted, considerable additional time is spent in the recruiting process, both by personnel department employees and the personnel of the hiring departments. Additional costs have been incurred by the college in revising all application forms and handout materials, training supervisors in new interview techniques, and posting and advertising full-time position openings. The amount expended by the college for advertising has increased by over 400%. The college advertises in the most popular newspapers of the area, along with all major minority newspapers. College funds have been expended in developing a computerized applicant file for full-time and part-time applicants. At this point in time, there are 3500 professional applicants on file in the data bank. Based on the vacancy the department head/supervisor has, our applicant file can be searched and within a 24-hour period all applicants on file who qualify for a position can be forwarded to a department head/supervisor.

Pursuant to our commitment to EA/EO, the college is expending considerable funds to develop a historical data file. This file will per-

mit the college administration to provide starting date, salary data, promotional data from the computer in a timely fashion.

An illustration of our process in recruiting and employing a person for a professional position that is already established in the budget and on the salary schedule is as follows: The supervisor who will make the original recommendation for employment will complete form P-26 titled Personnel Requisition Form. On this form the supervisor will outline the responsibilities, the educational licensing or special certification requirements needed for this position. (The requirements listed on this requisition form must coincide with the college's approved position specifications that are maintained by the director of Personnel Services.) Based on the data on the Personnel Requisition Form, the position is posted within the college for a minimum of five days. Concurrently, the college may advertise for external candidates in major newspapers in the area, minority newspapers, professional journals and publications, and in the Chronicle of Higher Education. When sufficient time has been given for advertising and receiving applications, a cut-off date is established in which the college administration will not accept any additional candidates. At this point, either the supervisor or a screening committee will paper screen all internal and external applications. The paper screening will normally reduce the number of candidates to a pool of three to five. The remaining candidates are personally interviewed. It must be demonstrated that an effort was made to find qualified minority applicants. A selection is made from this applicant pool and forwarded through channels to the President. The approval must go through channels, and may require two or three additional administrative approvals, depending on recommending department. The recom-

mendation is considered by the President, and he makes a decision as to whether the person is recommended to the District Board of Trustees for employment. At this point, the unsuccessful candidates are advised in writing that a selection has been made for the position for which they applied.

With the new Federal and State Statutes and rules that affect EA/EO, the administration has to be far more deliberate, organized, and structured in the process of employment. For applicants applying for positions and applicant pools, the administration must be consistent in adhering to posting notices, advertising, paper screening of applicants or whether the person(s) will receive a personal interview. In monitoring the employment process, the administration is concerned that reverse discrimination doesn't take place where department heads and supervisors may recommend minorities, women, and the handicapped who may not meet minimal qualifications. A primary objective in the employment process is consistent treatment of all applicants.

Much time is consumed in monitoring and reviewing promotions that take place within the college. The administration reviews the promotional process carefully to make sure that minorities, women, and the handicapped have had fair and equal consideration for promotion opportunities.

Internal candidates' credentials are reviewed carefully. Consistent treatment of candidates is imperative. If an applicant from outside is recommended for appointment, the process includes reviewing internal and external applicants to make sure that our employment process has been followed in a consistent fashion and that internal candidates have had ample opportunity to bid for the promotion.

Resignation and termination procedures are monitored. The President requires assurance that in the termination procedures the administration does not violate an individual's constitutional rights, or the various State and Federal rules under which we operate.

The college has incurred additional expenditures to better computerize personnel and payroll data and records. We are in the process of redoing the personnel/payroll system. A major advantage of the new system will be the capability of providing the historical record of an individual (pay, reclassification, change in rank, etc.) on line. This becomes very important as Equal Employment Opportunity Commission (EEOC) and other Federal agencies request voluminous amounts of data for individuals and their employment history at M-DCC.

Another impact that EA/EO has had on the college is the ease and capability an individual has of filing a complaint against the college with EEOC. Although the administration may feel that the complaint filed with EEOC is frivolous, nevertheless, EEOC usually will require extensive amounts of data, often about all employees, before they close the case, advise the complainant that they have no valid complaint, or advise the college that corrective action should be taken. The burden of proof is entirely on the college with nothing required of the complaining party but a statement of complaint. Defense against frivolous complaints can only be based on exhaustive records of personnel actions that are just now being developed at considerable cost.

Time is consumed in obtaining and submitting to the computer data bank data required to operate and provide reports for EA/EO programs. The EEO6 Report consumes time. Committees within the college that address themselves to the problems of EA/EO, such as the EA/EO College-

wide Committee and the Women's Committee, expend college resources in conducting meetings and research.

Starting salaries for professional staff members, faculty members, and classified-staff personnel are monitored carefully. The college makes an effort to be consistent in making sure that minorities, women, and the handicapped are treated fairly and equitably in establishing starting salary. Teaching experience and/or work experience may be granted to faculty members who are just commencing their employment at the college. This area of judgment makes the college vulnerable to to complaint, to the degree that change to formula calculations, no matter how inequitable, may be necessary as a defensive measure.

In summary, it is estimated that the director of Personnel Services spends from 25% to 33⅓% of his time in working on matters that pertain to EA/EO and Affirmative Action. In addition to this, the other professional staff members in the Personnel Department spend from 25% to 50% of their time in working on matters that pertain to EA/EO and Affirmative Action. An additional problem is that with our commitment to EA/EO and the added amount of time spent by administrators in the Personnel Department working on matters that pertain to EA/EO, there has been a drastic limitation on the Personnel budget. Consequently, administrators in Personnel have had to absorb the additional workload without being able to add additional people in implementing Federal and State laws and rules.

This effort is multiplied by the new more complex procedures required in all personnel actions at all levels. Bureaucracy is flourishing as checking and reviewing decisions is necessary at all levels of the personnel office for assurance of consistency in application of rules. This represents considerable change in college operations which have previously emphasized personnel decisions being made at the point of the immediate supervisor.

INCREASE IN STATE REPORTING RELATIVE TO CAPITAL OUTLAY PROJECTS

In 1975 there were three State reports required annually dealing with facilities construction. These were the Space Requirements Report (RF-1) which report space utilization; the List of Fixed Capital Projects (RF-2); and the Facilities Inventories Reports (IU - 1,2,3,4) reporting all rooms, buildings and land areas owned and/or operated by the College. By 1977 there were thirteen (13) required submissions to the State concerning facilities construction, even though the RF-2 was eliminated. A portion of this increase was a direct result of the creation of the Division of Educational Facilities Construction which became a separate and distinct unit apart from the Division of Community Colleges. This, in fact, created two units of the State Board of Education to which the College was responsible. The Division of Educational Facilities Construction, whose power has been granted through the Legislature and the Commissioner of Education, recognized a need to place greater control over the capital outlay funds. In response to this need, the community colleges were asked to report quarterly on encumbrance projections in order to receive its share of the money appropriated and to report quarterly on changes in the status of our capital outlay expenditures. While the control of these funds is absolutely necessary, the College has had problems with the nature of the reports. In order to avoid the loss of unencumbered funds, we have had to continually explain that unencumbered funds are not necessarily free balances and could still be required to complete the project. The college is requested to list two types of funds, encumbered and unencumbered. Since we can only encumber funds with the issuance of a purchase order, all

funds which are required to complete a project but could not be encumbered because we are not ready to complete a purchase order, are considered unencumbered. This would be true with the funds for the furniture and equipment for a new facility which cannot be encumbered until almost two years after construction has begun. Such funds are viewed as unencumbered for two years and are liable to be viewed as free balance, wherein the State has indicated that this money may be available to other colleges that need capital outlay funds.

Other problems have occurred with the Facilities Inventories in which we have found some of the items requested to be of no use to anyone. Furthermore, we have had communication problems with people in the State to the point of having several of our submissions either lost or interpreted inaccurately. These errors have cost us dearly in the way of time and effort, and as a result, we have chosen to create our own facilities inventory file and reporting format. There is a part-time person employed, at a cost of $8,000 to the College, to complete, coordinate, and update facility inventory reports and also the Space Requirements Report. The College has serious reservations about the worth of the latter. We do not feel the space utilization data, as requested, are valid as a measure of space needs. Suffice it to say, we do not have any use for the information contained in this report within the College despite the many hours devoted to collecting it.

During the past three years, State regulations affecting facilities construction have remained fairly stable and consistent. We have not found these regulations to cause undue hardships. There has been a new set of regulations issued within the past few months which are currently being evaluated. On first reading, there does not appear to be dramatic

changes from previous requirements although greater control is being exercised by the Division of Educational Facilities Construction. The major effect of the new regulations is to bring the community college regulations in line with other educational agencies such as K-12. There are several cases in which changes of certain portions of the regulations resulted in contradictory statements. These, however, were isolated incidents.

In sum, there has been a substantial increase in the State reporting requirements directed toward facilities construction. Some of the reports contain information which is either misleading or of little value to the College. The main purpose of the new requirements seems to be directed at gaining greater control of the capital outlay expenditures. In return for this State control, the College has had to increase its expenditure of time and money in order to continue to perform its major functions and still meet State reporting requirements.

MAIL AND ACTIVITY INVENTORY SUMMARY

As part of this survey to review the relationship between government and institutions of higher education, a mail and activities inventory was conducted at Miami-Dade to determine the number of incoming items that appear to have origin in state or federal regulation. This inventory included items that result from internal policies, procedures, committees, etc., that result from that legislation.

The following figures show reported correspondence (memorandums, bulletins, and reports) dealing with federal and state regulations and reporting, received by fourteen Miami-Dade administrators during the period of July 8, 1977 to August 5, 1977. Meetings attended relative to federal and state regulatory activity are also included.

Federal Agencies	148
State Agencies	86
Other	27
Total	261
Meetings Attended	14

The time period utilized to conduct this survey was, however, not truly representative for the total year. The summer months are normally slower. Consequently, this type of survey conducted during mid-summer almost certainly understates the typical flow of this type of material. The survey does, however, point to a constant of such correspondence. Even at this reduced rate this would produce 4524 pieces of correspondence for the 14 individuals in a year. Almost all of this correspondence requires response, some simply in the form of a letter, while some require construction of intricate systems of

compliance involving hundreds of invidivuals. Even this understated result gives a view of the sheer volume of state and federal involvement.

THE IMPACT OF STATE AND FEDERAL REGULATIONS ON THE CONTENT OF THE MEETINGS OF MAJOR COLLEGE COMMITTEES

There is a strong feeling among administrators of community colleges that an increasing proportion of their job is devoted to state and federal reporting regulations. This is perceived as a drain on time available for concerns having to do with the mission of the institution and the delivery of services to students. With constantly changing regulations, short reporting deadlines, and growing regulation and reporting complexity, many feel that long range planning is virtually impossible.

One test that Miami-Dade made concerning the impact of reporting and regulation on the job focus of major administrators was to review the minutes of the two major college committees -- the President's Council and Executive Committee, in order to see what percentage of each meeting was devoted to reporting and regulations. The Executive Committee is in effect the President's staff meeting, including the President, the Executive Vice President, and the Campus Vice Presidents. The President's Council expands this group to include other major District offices -- the Vice President for Business Affairs, Director of Occupational Education, Dean for Planning, Research and Computer Services, Vice President for Educational Services, Director of Personnel, Vice President of Instructional Resources, and five representatives from the Faculty Senates.

The President's secretary, who records and produces the minutes of these meetings, was asked to review each set of minutes for the calendar years of 1970, 1976, and through the spring of 1977; based on these minutes, she assigned a percentage of time within each meeting that was devoted to each item. The items that were the result of state and federal reporting and regulation were identified, and the percentages for

these items were summed, in order to estimate the percentage of time for each meeting that was devoted to these concerns. The tables that follow show the substantial increase in the percentage of these meetings that was devoted to state and federal reporting and regulation requirements. These are estimates, however, and one factor not included is that for certain topics, such as equal access/equal opportunity reports, full day meetings have been scheduled, while the typical Executive Committee or President's Council meeting is 2½ hours.

The increase of effort for state and federal concerns is most apparent in the Executive Committee meetings. For the twelve meetings in 1970, the average percentage of time spent on state and federal concerns was 7½%; for the six meetings held in 1977, the average was 61%. In the President's Council, the meetings in 1970 average 5% for state and federal concerns, while the 1977 meetings averaged 20%.

The Percentage of EXECUTIVE COMMITTEE Meetings For The Calendar Years 1970, 1976, and Through May 1977, That Was Devoted to the Implementation of State and Federal Regulations and Reporting Requirements

1970		1976		1977	
Date of Meeting	%-Federal & State	Date of Meeting	%-Federal & State	Date of Meeting	%-Federal & State
1/9/70	20%			1/24/77	60%
1/28/70	10%				
2/6/70	10%	2/12/76	65%	2/14/77	55%
2/10/70	-0-				
		3/22/76	15%	3/14/77	75%
				3/28/77	100%
4/16/70	15%			4/25/77	20%
5/26/70	-0-	5/7/76	45%	5/31/77	55%
6/15/70	-0-	6/10/76	85%		
7/20/70	10%	7/13/76	70%		
		7/20/76	-0-		
8/25/70	15%	8/4/76	25%		
9/21/70	-0-	9/3/76	55%		
10/19/70	-0-	10/4/76	10%		
		10/18/76	85%		
		11/1/76	100%		
		11/15/76	5%		
		11/23/76	100%		
12/16/70	-0-	12/6/76	20%		

80

The Percentage of PRESIDENT'S COUNCIL Meetings For The Calendar Years 1970, 1976, and Through May 1977, That Was Devoted to the Implementation of State and Federal Regulations and Reporting Requirements

1970		1976		1977	
Date of Meeting	%-Federal & State	Date of Meeting	%-Federal & State	Date of Meeting	%-Federal & State
1/19/70	15%			1/24/77	50%
2/16/70	-0-			2/14/77	20%
3/16/70	10%	3/22/76	30%	3/14/77	30%
4/20/70	10%			4/25/77	-0-
5/18/70	-0-	5/7/76	5%	5/31/77	20%
6/15/70	5%	6/10/76	45%		
7/20/70	10%				
8/18/70	-0-				
9/21/70	-0-	9/3/76	25%		
10/19/70	-0-	10/18/76	-0-		
		11/15/76	10%		
12/16/70	-0-	12/6/76	20%		

MAJOR NEW REQUIREMENTS IN THE FIRST WEEK OF SEPTEMBER, 1977

The alarming impact of state and federal laws, regulations and/or reporting requirements can be felt in virtually all segments of the College. Normally, the late summer, early fall has been a low point in terms of reporting compliance requirements. However, recent increases in or changes to regulations and reporting requirements are being requested in greater numbers than ever before. The new reporting requests for just the week of September 6 - September 9, 1977 serve as an example of the degree to which these requirements are impacting the College. These requests were as follows:

New Reporting Requirement, FE-1, Fall Enrollment Headcount by Age Groups

This report requires breakdowns by race and sex for each instructional category (Advanced & Professional, Occupational, Development & Community Instructional Services) of the following age groupings:

0-14	30-34	50-54	70-74
15-19	35-39	55-59	75 and over
20-24	40-44	60-64	
25-29	45-49	65-69	

This report will require an emergency program request in order to complete it on time as we have not previously reported by age group.

Revised Forms for Reporting Capital Outlay Encumbrances Projections (Form CO-2) and Change in Status of Capital Outlay Funds (Form CO-3)

Both reports have been revised in terms of format and detail of information required. These revisions require more preparation time for completion of the final report.

Revision of the CO-1 (Capital Outlay Funds - Budget Request)

This report, which affects future construction programs, has been revised and now requires detailed five-year capital outlay projections and encumbrances, disbursements and balances through the 1978-79 year. Because the

requirements are so extensive and the time period for completion so short, the College will be forced to submit a makeshift report.

New Requirement Emerging from Senate Bill 29A Affecting State Law 235.045

The College is now required to conduct an in-house survey to determine whether space suitable for instructional use is available in any public or private facility which may be leased or otherwise acquired to meet the instructional needs of the Board of Trustees. This is to be completed prior to the construction of any new spaces for instructional use. It is anticipated that a great deal of time and effort will be required for the preparation of facilities surveys since only items recommended by the survey team can be listed on the Project Priority List and followed through to completion.

Revision to the Space Utilization Reports, RF-1

The College learned that massive changes are being made to the Space Utilization Reports. Significant changes must now be made as a computer program had just recently been developed to collect information for this report.

Revised EA/EO Plan

A total revision of the original 1975 EA/EO Plan must be submitted to the Division of Community Colleges by October 21, 1977. This assignment is quite significant as the narrative sections must be completely rewritten and five-year projection tables for both enrollment and employment statistics must be developed. This is required as a new state plan was adopted. The time allowed assures that we will do a makeshift job.

Requirements Relative to Sections 503 and 504 of the Rehabilitation Act of 1973

These sections of the Rehabilitation Act deal with affirmative action/non-discrimination obligations of federal (sub) contractors for the employment of the mentally and physically handicapped. As a recipient of HEW funds,

Miami-Dade must complete an extensive self-evaluation in consultation with handicapped individuals and organizations to determine which, if any, policies and practices need to be changed to assure equal opportunity for the handicapped by June 3, 1978.

These new reporting requirements are in addition to the reports normally due in the month of September. These existing requirements for September are as follows:

ET-3 - End of Term Enrollment
OA-1 - Annual Outputs
OA-2 - Acceleration Report
PA-2 - Occupational Program Personnel
SPD-2 - Staff & Program Development Activity Evaluation
FA-4 - Student Semester Hours/Final Enrollments
IU-1,2,3,4- Facilities Inventory Update
CI-1 - Community Instructional Support - Citizenship Courses
CI-2 - Community Instructional Support - Recreational & Leisure Time Courses

SUMMARY OF CAMPUS GROUP INTERVIEWS

Miami-Dade Community College faculty members at the North Campus, New World Center, and the South Campus participated in a series of structured group interviews to discuss state and federal regulations and reporting requirements. Teaching faculty, chairpersons, and associate deans participated at each campus. This is a summary of the opinions that were expressed repeatedly during these interviews. See Appendix A for questionnaires used during the interviews.

> "THE INSTITUTION HAS CHANGED A GREAT DEAL. WE ARE NOW MORE CONCERNED WITH STATISTICS AND PAPERWORK AND LESS CONCERNED WITH WHAT GOES ON IN THE CLASSROOM."
>
> M-DCC Faculty Member

Perceived Institutional Changes as an Outcome of Increasing Federal and State Regulation and Reporting Requirements

Increases in the paper work needed to complete federal and state reports have changed the institution in terms of the growing percentage of time devoted to concerns other than teaching, counseling and educational leadership. Since 1970, time needed to complete reports has tripled for many.

Veterans regulations have created value conflicts for some faculty due to what is perceived as discriminatory monitoring of veterans.

Centralization has resulted from a greater need to coordinate efforts relative to compliance and reporting.

Funding has decreased; regulation has increased -- more personnel are needed to monitor and to prepare reports but there is less money to hire personnel to perform these duties.

Some demographic changes have occurred. Federal regulations foster recruitment of students in need of remedial assistance. Faculty must cope with demands made upon them in bringing these students up to academic standard. Quality education for all is difficult when working with academically unprepared students.

Increased regulation pulls top administrators away from the campuses where they are needed; faculty are pulled away from students.

Personnel standards have lowered because of adherence to EA/EO regulations. The most qualified individuals are sometimes not hired because of adherence to the plan.

Bureaucracy and red tape have increased, e.g., the procedures involved in hiring due to EA/EO regulation has slowed down the process; firing of personnel has also been affected.

The institution is more structured.

Students and faculty perceive the College to be a growing bureaucracy, but fail to realize the cause is, in many instances, external to the organization, and not internal.

There has been a curtailment of institutional freedom as a result of funding with "strings attached."

Additional time has been spent by some faculty in attending training sessions that accompany understanding the implementation of new regulations.

Architectural changes have taken place due to adherence to regulations involving the handicapped.

Attitudinal Changes as an Outcome of Increasing Federal and State Regulation and Reporting Requirements

Faculty feel helpless as they fail to understand their responsibility in terms of implementing new regulations.

Faculty previously felt more influential in dealing with the State Legislature. They now feel ineffective, but it is difficult to pinpoint reasons for this change of attitude.

Faculty fail to comprehend why they perform certain duties in carrying out job functions relative to federal and state regulations.

The usefulness of the information submitted in responding to reporting requirements is perceived as negligible. This results in frustration on the part of those persons preparing reports.

Faculty feel "tied down" to reporting requirements, but some feel regulations are necessary to keep the intent of legislation as the focus of administrative decision-making.

The attitude toward the intent and the philosophy of federal and state regulation is positive; implementation engenders negative attitudes.

Students and faculty are frustrated by the feeling the changes are being made but are uncertain as to what they are or what their origin is.

Faculty morale becomes an issue in considering implementation of federal and state regulations and reporting requirements.

Fear and anxiety are engendered in faculty due to possible failure to strictly adhere to federal and state regulations which can result in loss of funding, lawsuits, etc.

The relationship between faculty and administrators has become distant and strained as the institution has grown in size, and as

regulatory activity has increased.

Individual Problems Encountered in Responding to Reporting Requirements and Federal and State Regulations

Faculty fail to receive feedback and information about decision-making that results from reports submitted.

Technical problems are encountered, for example, changes in forms used, variations in format and preparational procedure, and additional information requested. These kinds of changing ground rules have contributed to making reporting activities astronomical.

Regulatory and reporting systems work against efficiency and economy, while financial support is declining.

Inaccurate reporting and slanted statistics are often the result of inability of campuses to respond to information requested.

Faculty are not always certain they are adhering to federal and state regulations in making decisions.

"Administrative monsters" have been created by the complexity of new regulations."

"Hidden time" is spent on regulatory activities as faculty may be unaware of the extra time devoted to compliance with federal and state regulations.

Recommended Solutions to the Problems of Compliance with Federal and State Regulations and Reporting Requirements

Set up an office for federal and state monitoring and reporting, utilizing personnel external to Miami-Dade Community College.

Visiting teams from federal and state offices are recommended, as those monitoring offices are too far removed from the college campuses.

Student, faculty and community polling might be employed to determine the effectiveness of institutional compliance with federal and state regulations.

Federal and state regulatory agencies need to educate the community in terms of compliance, so that monitoring will come from the "grass roots" level, as opposed to the "top" where the impact is rarely felt.

THEMES REPEATED BY ADMINISTRATORS AND AREA HEADS

During the summer of 1977 a series of interviews were conducted with members of the administrative staff of Miami-Dade Community College. The purpose of the interviews was to gather data to determine the impact of state and federal regulations and reporting requirements on the work of the staff in the College. The interviews were conducted by Richard Corseri, a faculty member who was released to work as staff for the self-study.

A single interview format was used consistently (see Appendix A). A copy of the format was provided each of the interviewees some weeks prior to the actual interview. This was done to assist them in preparation and to sensitize them to the purpose of the self-study. The interviews were not restricted to a specific amount of time. All 22 interviews were recorded on cassette tape.

During the interview process a number of common themes emerged. This suggests their importance to the perceptions of the College administrative staff. Summaries of these common themes follow. Later in this section quotes from various individuals are provided by theme.

The problem is not with the overall goals and concepts, but with processes and detail. The concepts and purposes behind government legislation and regulations consistently were perceived to be positive and well-intentioned. John Losak noted, for example, that "I should make it clear, I'm not in disagreement with much of the main concepts involved. . ." This thought is echoed by Richard Schinoff: "I think some of the basic philosophy behind these regulations . . . is good. . ." Phil Nicely refers to the objective of EA/EO as "noble, and I support

it fully."

Most staff members, however, had strong criticisms for what Nicholas Gennet calls the "bureaucracy, the procedure, the implementation, and the reporting" requirements that attend so much federal and state regulation. Tom Stewart assigned the word "overkill" to such bureaucratic procedures attending the implementation of regulations. Further, Phil Nicely points out that "the state defines. . . requirements to a . . . level far more detailed than the state needs and far more detailed than we can use here in the College." According to Richard Schinoff, the government agencies "get carried away with the reporting . . . details and forms."

The result of the aforementioned "overkill", according to Nicholas Gennet, is that certain of "the procedures and the implementation of some of these regulations are so onerous, even though they are well-intentioned, that in the name of institutional survival, people spend their time trying to figure out how they can get around the regulations and, therefore, such action defeats the purpose of the regulation itself.

Complicating the implementation process is the perception that data collection requirements by governments often occur too frequently. Notes Phil Nicely: "In the area of student follow-up and placement, my main quarrel is with the frequency of data collection. My recollection is that the state requires this information annually, which is abused. My own feeling is that probably a sampling every three to four years would be adequate to detect the kinds of trends that we should know about."

There are indeed so many regulations and requirements that to respond to them all effectively has become difficult or impossible. Terence Kelly points to this theme when he says that ". . . in the last two years there have been so many laws that have been passed which

simply cannot be implemented at our College. . . It really doesn't matter how many laws come down -- we can only implement and respond to those that are reasonably practical and for which the institution has some expectation that it can meet the requirement." Terence Kelly cites some examples, such as the "85/18" Rule of the Veterans Administration. John Dannelly, when referring to the government agencies, states that "some of the information that they want us to provide is unrealistic. They make unrealistic clerical demands on us."

The deadlines that accompany federal and state regulations and reporting requirements are often unrealistic and force the administrator to put aside the work of the institution to provide reports that are certain to be poorly done. Wilbur Holladay notes that "the EA/EO Program has had priority and consequently, we have dropped other things . . . that we feel are very important, but they're on the back burner at this point because we simply don't have the time." Notes Jeff Brezner: ". . . one of the federal grants for which we were eligible could not be completed in sufficient time in order to enable us to receive the money."

Emergency programming is often necessary in order to deal successfully with certain time requirements. Such emergency programming " . . . disrupts other components of the college" says John Losak. " . . . if the time requirements and constraints were more flexible, these data collecting and reporting activities would not have as powerful an impact." He adds that "the essential issue is perhaps. . . the manner in which and the timeliness with which the regulations require the reporting of the data."

George Mehallis introduces a further dimension to the problem when

he declares that "where unrealistic deadlines are imposed on an office it disrupts the work routine and priorities not only of the office responsible for the completion of the report, but throughout the college."

A factor that tends to create or at least exacerbate deadline problems is the lack of coordination between government agencies' calendars. It is inevitable that reports for different agencies seeking similar information are required about the same time. Indeed, the deadlines for submitting these reports often cluster around a similar date. Denise Hahn thinks that "there should be an annual calendar of dates for date requests." This would alleviate the pressure during the periods of intense effort to simultaneously meet various deadlines. As noted previously, such effort tends to impinge upon the regular activities of the administrative staff. Calendar coordination could enhance the preparation work necessary for the various reports.

Denise Hahn further indicated that the government agencies often do not provide enough time for reports to be prepared. In such cases, therefore, deadline dates would be difficult to meet even if there was some coordination between agencies. "Last year HEW requested from us a report in mid-September that had an October 1 deadline" claims Denise Hahn. There is therefore a need not only for data and calendar coordination between the various agencies but also for greater sensitivity on the part of some of those agencies to the College's limitations of staff and time as well.

Terence Kelly cites examples of the College receiving delayed government mail months after the indicated date on the letterhead. Often this mail includes deadlines for the College for submitting reports or fulfilling requirements that are realistic relative to the indicated

date of the initiation of the letter. These deadlines may, however, be impossible to satisfy given the shortened time available to the College as a result of delay in receipt of the mail.

Yet another problem compounding the college administrator's job is the overlap of certain regulations. In the overlap, conflict may arise, causing a quandary to the administrator as to how to proceed. Wilbur Holladay points out that "it is a problem to us at times that HEW and the Labor Department are not at all coordinated. ". . . those agencies do not accept each other's data." George Mehallis adds that "often times in reporting we have found conflict in code numbers of programs or courses." There is perceived to be an overlap of authority among the divisions of state level government.

Phil Nicely provides an example of the problem at the federal level: "the conflicting federal requirements which relate to what can be asked a person before and after he is hired make it very difficult to implement EA/EO in a reasonable way."

Conflict is often between state and federal levels. Terence Kelly is of the opinion that "due to the utter absurdity between the Buckley Amendment and the state requirements, the college had to really disregard both sets of rules, regulations, and guidelines. We had to adopt a common sense approach to dealing with the topic of records release until such time as the state and federal governments could get reasonably closer together."

In further reference to the Buckley Amendment, Terence Kelly evaluates the situation in Florida to be "a nightmare; it was only in this past legislative session (1977) that the state passed a bill entitled Student Records, Chapter 7706- (SB359) which was an attempt to

align the state law more closely with the Buckley Amendment."

John Losak concludes that this problem of overlap and conflict between different levels of government "has come to the front on a number of occasions. This is particularly the case when there's a conflict of state and federal regulations with regard to definition of terms."

A Florida State action that conflicted with federal regulations was a plan under the Education for All Handicapped Children Act. Areas of conflict included state education agency authority, due process requirements, non public schools, testing, and teacher certification. A further problem, according to a staffer of the appropriations committee of the Florida House "is that conforming to the federal requirements would 'in essence jeopardize the state's current $159 million investment for this coming school year' in special education in exchange for only $7.4 million in federal funds," (Educational Recaps, Vol. 16, No. 9).

Despite reassessment of its position, a state spokesman said that "we are still refusing to accept dollars under the established (federal standards). Under no circumstances are we going to conform" (Educational Recaps, Vol. 16, No. 9). Such conflict and confusion at the government level has indirect, but nonetheless real, impact for an institution such as Miami-Dade, which is dependent on government financial input.

There has been an expansion of the volume of regulatory activities and reporting requirements from both levels of government, especially during the present decade. An indicator of these growing requirements on the College is the number of state-required reports, which continue to increase dramatically. There was an increase from 34 in 1975/76 to 43 in 1976/77, and more importantly the detail and complexity continue to burgeon.

The increase of regulations from different levels of government has been accompanied by an increase in overlap and conflict among regulations.

Different government agencies want the same or similar data, but often they use different formats for requesting the data, causing much duplication, which Cindy Smith and Sue Skidmore call their "biggest frustration." They indicate that often they will ". . . be asked for the same or similar information in a different format. . . That requires re-programming . . . and valuable time is lost." Richard Schinoff adds that "every time we turn around, we're not giving the data in the exact format someone wants. . ." Even when one government agency defines a single term differently than another, "you have to adjust the computer programming," adds John Losak. "There needs to be . . . better coordination."

Cindy Smith and Sue Skidmore claim that ". . . a study was being done to determine whether we could establish a statewide system for management information systems to be useful to all the colleges so that data could be collected in one form and used uniformally throughout the system to avoid this duplication. So far, that hasn't happened."

College administrators face yet another form of duplication. State guidelines for preparing reports are sometimes perceived by them to be unrealistic, misleading, and of no use to the College. Yet, such guidelines may relate to an area for which the College truly needs data. Thus, two reports must be produced, one for necessary internal use and one which is meant to satisfy government requirements, although the data within the latter is considered useless to the institution.

An example of this problem is the program budget report that Miami-Dade Community College has been required to prepare by the Division of

Community Colleges of the State of Florida Department of Education since 1974. The report is intended to be a vehicle for transferring planning information to the State Legislature in the form of a common program format. Addressing a financial plan spanning perhaps six years, the report includes past, present, and projected future costs that are meant to enable the Legislature to better respond to College requests for appropriations.

Miami-Dade utilizes a line item budget for internal control and in fact must present such a budget to the State for approval. The College has a system for projecting needs and appropriations. The format of the State program budget was not of value for management and was developed only as an exercise to meet State requirements. Yet, it had to be done with care, as one never knew when data would be pulled from that report and used as a basis for determining the College needs. In this way much report preparation is defensive.

The cost of preparing the program budget results from the need to collect extensive and comprehensive information, some of which is not immediately available. In a report (Brezner, "Summary of State Reports Completed by Office of Resources Planning," Jan. 16, 1976) submitted by Brezner, the costs were outlined. Approximately 350 person/hours were expended by twelve administrative and five classified personnel at an estimated dollar cost of $4,000 to prepare a program budget.

According to Jeff Brezner, "the information collected is largely unused at Miami-Dade Community College due to its lack of validity." Brezner claims that the required State guidelines for preparing the report are unrealistic and do not reflect the actual inflation factor. He concludes that "it is hard to understand how the State can, with any

confidence, use the bulk of the information contained in this report, which is of so little value to the College."

A May 26, 1977 memorandum to community college presidents from Lee G. Henderson, Director, Division of Community Colleges of the State of Florida Department of Education, tends to support some of the observations made by Jeff Brezner. The memo reminded the presidents that "for the past three years, the Division of Community Colleges has collected a program budget from each of the community colleges. As you know, the information collected has not been used for planning or budgeting, largely because of a decreasing interest in PPBS at the State level" (from a May 26, 1977 memo by Henderson). The memo noted that an effort would be made to eliminate the requirement for colleges to submit a program budget.

"Even in cost analysis data," says Phil Nicely, "the way we present it to the State is different than the way we prepare it locally so that the campus vice presidents can determine what's going on. . . The cost analysis data as required by the State can thus be very misleading. After preparing the cost analysis data for the state, using the procedures required by the state, we redo it for Miami-Dade, using faculty salaries."

Another common theme voiced by many of the administrative staff at Miami-Dade Community College relates to the legal and legislative framework within which they must function. It is in a continuous state of flux. The continuous modification of the ground rules attending regulations exacerbates the difficulty of implementation. "Sometimes these modifications may seem very simple to the State," says Phil Nicely, "but they might require many, many man hours of programming changes

to make. For example, alternating two columns on a printout, just changing their location. It seems very simple to the State, but because of cascading effects from program to program, that change might be very complicated to make, and costly."

Modifications may prove metamorphic. Tom McFarland notes that "the standards for academic progress which had been previously imposed and initiated in our Spring Term were completely changed as the result of the 1976 legislation." Mr. Steward adds that "some of the regulations changed several times." Indeed, "every time you get a form and fill it out," says Richard Schinoff, "there's another revision . . . and just all kinds of categories that have changed a couple of times in the last few years." Governmental definitions change so rapidly that the result is described by John Losak as "disconcerting. If one changes each year the definition, you have to revise your entire system. Then you don't have a benchmark. . . and data is very difficult to compare . . . It doesn't permit comparability."

"Ground rules" changes cause certain special problems. George Mehallis sees as "one of the most frustrating state regulations . . . the change in process for the community instructional services program over the past three years. Terence Kelly emphasizes "the fact that some portions of the Buckley Amendment are subject to change in the Congress. Any one of the changes could again seriously alter the approach that the college takes to implementing the Buckley Amendment."

The administrator must invest time and effort to keep abreast of change. Nicholas Gennet, referring to the implementation of a new disciplinary system, argues that "we'll also have to be watching very closely in terms of updating to keep it in line with new interpretations

of the law . . . once you create a system, you've got a real maintenance factor which is also energy consuming."

There is some fear that a regulation, once established, can set a precedent for further regulation. There is a growing concern that the momentum of regulation, especially since the 1970's, has an intrinsic factor of continual expansion. ". . . state and federal regulatory requirements have become geometrically disproportionate in terms of their growth in the last five years," claims John Losak. "There are many spinoffs of requirements having to do with such matters as the Office of Civil Rights, placement and follow-up efforts, etc. . ."

The "process of implementing a new regulation is involved," says John Zeien. "It's not something that comes in and leaves after a period of time. It continually builds up." "A good example. . ." notes George Mehallis, "is the community instructional services program."

Not all administrators agree to exactly which year was the initiation point to the present rapid rate of growth of regulation, but all indicate that it has been recent. "The big year was 1972," says Sam LaRoue, "when the State started its cost analysis system (MIS) work. The volume of reports rapidly expanded and has continued to increase." Jeff Brezner began his present job as Director of Resource Planning in 1974. "At that time we had approximately four reports that had to be turned in to the State on an annual basis. Since that time the number has increased to approximately fifteen reports." Sue Skidmore and Cindy Smith see 1975 as the year when "their whole process at the College began . . . when we put together a voluminous Equal Access plan and ever since that time there have been many offshoots of that." Tom McFarland calls to attention the year 1976, when legislative

modifications resulted in the V.A. inundating "colleges and universities with dozens of circulars and hundreds of pages of regulations. These regulations increase the burden of reporting and are infringing on academic and administrative policies of all our educational institutions."

Sue Skidmore and Cindy Smith claimed that "the major way their job has changed is simply in terms of volume. The number of state and federal reports that we are asked to complete each year has expanded greatly."

Government regulations and requirements have shifted the attention of many college administrators from internal concerns to external ones. Terence Kelly notes that "if there is a single change in the function of chief student affairs officers or people who deal in the leadership area of student personnel services, it has been the shift away from developing, implementing and evaluating programs which are created at the institution. The emphasis now strictly is a reactionary one; that is, trying to respond to various pieces of federal and state legislation in the area of students' affairs to make certain that the institution is in compliance, . . . (that it's) house (is) in order in regard to the great myriad of laws, regulations, procedures, and guidelines that have come forth from . . . governments."

George Mehallis feels that the rapidity of legislative change makes it "almost imperative to get involved with professional organizations and agencies outside the institution." The complexity of administrative decision making has been compounded by "external expectations that the administrator must confront, so that in making a decision today, in 1977, as opposed to 1970, the administrator must be much more conscious not only of what the internal critics within the institution are thinking

. . . but also, increasingly, . . . with external critics who impose their own sets of expectations."

Dealing with government regulations and reporting requirements also moves the administrator's focus of attention from people to paper. "I know one thing," says Richard Schinoff, "I wouldn't be talking to pieces of paper, I would be dealing with students and with faculty. . ."

If Miami-Dade desires participation in federal aid programs, "it must go through the giant paper mill which seems to accompany each and every grant regulation," says Al Smith. Additionally, the State's requirement on the retention of records has literally inundated the institution with old records of all kinds being stored throughout the institution with practically no storage space available." Terence Kelly is concerning with keeping "accurate records of what information is released by the various custodians of records" at Miami-Dade, because of the Buckley Amendment. This concern causes the need to file the records in the proper student folder, "again this means more time and more effort on filing, and keeping track of forms, etc..." (and less time and effort with students). William Stokes, referring to the curtailment of other activities due to regulations, finds that he "cannot devote the necessary time to the activities which could have a more significant impact upon student learning."

Uncertainty of the level of government financial support causes difficulties for planning for staff and campus operations generally. "The State funding formula and its massaging annually by the Division of Community Colleges, keeps the District and campus administrators in a state of limbo for several months," says Al Smith. George Mehallis adds that "where federal projects are funded piecemeal, this leads to

an insecurity on the part of the project director and those involved with the project. It places the administrator in the position of begging for verbal promises of funding in order to bring the project to completion." Finally, Jeff Brezner notes that the Division of Community Colleges encourates Miami-Dade to use assumptions regarding State appropriations in budget preparation, however, there is no guarantee of result.

It is interesting to record statements by administrators that reflect the impact of requirements on their attitudes. Wilbur Holladay "detests . . . having to fill out forms and provide voluminous amounts of data on such things as complaints when it appears the complainant in the first place doesn't really have a lot of substance." But fill out forms he must. Cindy Smith and Sue Skidmore find it difficult "to get people on the campuses to respond (to data collection) when they've done it a thousand times before, when they don't see any useful need or benefit coming out of it. They are confronted with situations "where people are reluctant to give. . . information . . . you have to keep contacting them. It doesn't work well that way."

Terence Kelly talks about the negative impact of external requirements "on one's attitude in relation to one's respect for the law." These requirements have also caused him "to become very cynical and somewhat non-responsive to institution requirements."

Thomas McFarland states clearly that the V.A. requirements have made his work "very difficult, very complex, and on many occasions distasteful because of the discrimination of the veterans."

Indeed, government regulation has resulted in differential treatment of certain categories of students. Referring again to the veterans, it can be noted that when the standards of academic progres were

changed in 1976, it placed an unusual additional burden on them. Relates Tom McFarland: "No longer would veterans have their cumulative grade point averages recalculated with zero credits for withdrawals, incompletes, or audits. Such grades automatically result in an over payment under the new regulations; therefore, the veteran automatically owes a debt which he must pay the V.A. This conceivably could encourage veterans to opt for F's to obtain benefits while other students will receive W grades without jeopardizing their academic standing. Thus, veterans will be judged by different academic criteria than other students including recipients of other forms of federal aid in the same course of study."

The lack of feedback for his efforts negatively impacts the administrator's attitude as well. Administrators often do not know what government agencies do with data that they have required the college to collect. Cindy Smith and Sue Skidmore wonder "if the information we hand over really gets used." They "really don't get much feedback from either the state or the federal government. . ." John Losak has some doubts whether "there are enough people in the legislative and court bodies to review the thousands of pages of data . . . It's difficult to see how they could expend sufficient time and energy . . ."

Richard Schinoff feels "frustrated for the people who had to fill out . . . forms that no one even looked at . . . I don't know what the Archives Bureau is going to do with all these reports." Jeff Brezner thinks that some of the reports are "of no discernable use to the government body that initiated them . . ." Al Smith indicates that "the voluminous response could not possibly be covered by the governmental agency involved." Wilbur Holladay suggests that some of the

required reports "seem to us just an exercise in futility . . . excessive bureaucratic reporting. . ."

The lack of feedback data from both state and federal levels makes it difficult for George Mehallis to interpret its intent. He finds that feedback data is "meaningless because in almost every case, it is at least two years old."

Regulation tends to limit innovation. Richard Schinoff sees ". . . a lot less flexibility in being able to make decisions without referring to a policy manual or procedures manual." In his area of activities, veteran's affairs, Tom McFarland finds that there is "no longer control . . . these regulations . . . are infringing on academic and administrative policies . . ."

The administrations of many state institutions feel constituent pressure to avoid non-conformity. This pressure is passed on to the colleges through government regulations and requirements which, in order to enforce such conformity, initiate strict and cumbersome procedures. George Mehallis states, for example, that "a recent state regulation imposed on community colleges requires that all new occupational programs receive a prior review by the state based on a 7-point criteria. . . the process is cumbersome, time consuming, and infringes very heavily on. . . manpower resources. . ."

Decisions are more difficult and longer in the making as a result of external regulation. Comparing the process today to the process of 1970, Nicholas Gennet notes that "the administrator must be much more conscious not only of what the internal critics within the institution are thinking but also increasingly . . . with external critics who impose their own set of expectations."

Regulation can, in fact, shape a job at the administrative level. Notes Al Smith, "I have come to accept living with these regulations and reporting requirements as a way of life. . ." About one fourth to one third of John Losak's "time is spent in various ways with state and federal regulatory impingements." State enforcement of placement and follow-up regulations necessitates John Losak to hire "a full time person to direct these efforts." Jeff Brezner also indicated that a person had to be hired specially for the facilities inventory update. As aresult of a greatly increased volume of regulations, Tom McFarland estimated that "prior to 1975 approximately 10% of my time was devoted to veteran's affairs. This has now increased to approximately 50% of my time."

Some administrators perceive hidden factors that make it impossible to statistically measure the total cost that apparently results from regulation and attendent reporting requirements. "There are so many spinoffs of requirements that the dollar impact on the institution is extremely difficult to assess," according to John Losak. George Mehallis reinforces this viewpoint: "When I have to rely on people from other campuses, departments, or divisions for data, it is very difficult to determine the man-hours expended in gathering the data and try to relate this to the cost factor." Further, the problems of data collection at Miami-Dade are uniquely complicated as a result of the size and diversity of the institution.

Not so hidden is the cost incurred as a result of the necessity of hiring an attorney for the purpose of clarification of government regulations. Richard Schinoff consults the "college attorney a lot on clarification, especially about things the courts have said recently."

Many administrators need to acquire legal knowledge on their own. ". . . What is emerging," says Terence Kelly, "is a new requirement to be a quasi-legal authority on all existing. . . laws, with some indication of where they may change and what new trends prevail regarding legislation." He also finds that an increased reliance on advice from the college attorney is necessary. George Mehallis' role is made more difficult by the necessity of "keeping current with the federal legislation that impacts directly the programs for which this office is responsible." Horace Traylor has found that "the guidelines for interpreting . . . legislation seem confusing and do not shed much light upon the legislation they seek to make more operational. . ." Tom McFarland claims that "our attorneys continue to disagree with V.A. concepts."

At the campus level the impact of government regulations is felt more directly through the implementation of additional college procedures and organizational structure developed to respond to the added requirements imposed at a state or federal level. Thus, the focus of frustration of campus personnel is often the college District operation, which is really only an intermediary in these cases. Notes George Mehallis: "Oftentimes in completing reports, it is necessary to rely on people on other campuses, and depending largely on meeting the deadline, this has caused many anxieties on the various campuses and antagonisms toward Central Administration."

Government demands for the College's accountability are perceived by many administrators to be too demanding or to not make sense. College personnel are frequently required to spend long hours producing reports that they are convinced have no value. Miami-Dade is a responsible institution with a fine record of compliance with the law and demonstrated

concern for societal needs. Often it seems that requirements are imposed because of the abuse or alleged abuse of regulations by others. Regarding EA/EO requirements, for example, Sam LaRoue notes that Miami-Dade "has been doing a good job in this area all along. I think it is a requirement imposed on everybody because a few institutions have not done their job. This hurts the College to have to expend the additional funds to prove that we are already doing a good job."

Tom McFarland also finds the abuse of others, few in number, to be the cause of unnecessary and even damaging imposed regulations. "It has become evident . . . a few veterans and a few educational institutions were abusing the benefits authorized under the improved G.I. Bill and the V.A. regulations. In 1975 the V.A. launched a campaign to correct the few abuses through continuous and pervasive regulations imposing numerous restrictions and extensive reporting procedures on all educational institutions enrolling veterans. The V.A. has intruded into management of higher education infringing on institutional prerogatives and seriously limiting the services to veterans as intended by legislation of the U.S. Congress. The cumulative effect of V.A. regulations is significant discrimination against veteran students who can no longer pursue a higher education under the same academic standards prescribed for all other students."

The result of regulations imposed as a reaction to a few delinquent institutions or individuals is a form of undeserved punishment -- what John Stewart claims is "once again an overkill for them as well as us." Richard Schinoff refers to the records staff on the Buckley Amendment as "a myriad of regulations that really wasn't needed." Tom McFarland sees the "85/15" Rule as another contraversial issue "which prohibits

educational benefits for courses where more than 85% of the students are G.I. Bill beneficiaries or federal grantees. . . Initially the G.I. Bill included this "85/15" Rule to prevent proprietary colleges from continuing to exploit veterans benefits for higher education. However, the 1976 legislation extended this to all colleges and universities in our view without any foundation. It rejects reliance on institutional judgment and policy and seeks to impose another layer of bureaucracy."

Programming and planning for higher education is becoming increasingly centralized. It is perhaps axiomatic that the more money provided by a governmental body to an institution, the more its ability to successfully demand accountability and regulatory requirements from that institution. There appears to be a close relationship between the sources of finances and the sources of power to control. The result of this centralization is a large statewide system of which institutions of higher learning can be viewed as subsystems.

It is quite clear that Miami-Dade is a subsystem of the Florida State Educational System and can be compared to a link in the systems chain that extends from the Florida Legislature down to the student. Growing centralization is a reality for Miami-Dade. The tendency is to accrue increasingly more authority to the sources of power. Again, these sources of power are related to the sources of finances. The State Legislature is the major source of both. The form of centralization is no longer only setting goals and evaluating achievement, but as in Community Instructional Services, it is interceding in the decision-making process. To us, this appears to be costly and cumbersome.

Along with centralization on a statewide level, there is internal centralization. This is happening to a great degree as a result of the

increase in government regulations, which are often open to interpretation. Increased centralization at the District level, or at least institution-wide decisions, is often the only way the college can deal with regulation. Further, as more requirements are imposed, there is an ever increasing need for internal centralization in order to maintain a uniform college-wide policy response.

Terence Kelly's office has "become the decision-making office in many questions regarding the Buckley Amendment throught the institution" in order to deal with the bureaucratic confusion attending the amendment.

Al Smith also indicates that there are problems of interpretation resulting from imposed requirements: "The placement and follow-up requirement imposed upon the institution by legislative action a few years ago has resulted in considerable administrative time being consumed and meetings where the participants were groping to determine what the state really wanted in this area."

Richard Schinoff points to the special problems that a multi-campus institution faces as a result of the need for a collegewide response: "We have in my area four deans that we try to get together to agree on something so we can go with one institutional policy."

"A good example of centralization," according to George Mehallis, is "the advent of having to formulate a campus-wide Continuing Education Committee to cope with the standardization of reporting, articulating course offerings and fee structure." Tom McFarland provides another example when referring to the Financial Aid Coordination Committee, "which is most significant in the management of financial aid funds throughout the institution . . . general management is accomplished at the District level . . ." He notes further that "The Educational

Amendments of 1976 required the campuses to develop plans for increased consumer information . . . Currently our campuses are working on their programs with the objective that the Financial Aid Coordination Committee will eventually take the campus plans and integrate them into an institutional plan to improve consumer information."

The concept of a larger system has received considerable support as an efficiency tool for avoiding waste and reducing repetition. Problems have resulted, however. Communication gaps in macro-systems appear to be intrinsic to the nature of such systems. The "concentration of authority and decision-making in the hands of a few has created a gap between psychological needs and opportunities for meeting them which grows wider as one descends the chain of command" (Richardson, et al).

There is little to support the idea that larger systems considerations result in efficiency. According to George Mehallis, "There is no evidence to support the assertion that there is more efficiency and savings through larger systems considerations. Some gain can be achieved by eliminating unwise duplication, but this is also exaggerated as duplication is only costly when it results in student populations in programs below a critical mass for cost effectiveness. Duplication where there is a critical mass of students at several institutions often results in improved service, through convenience and competition." Phil Nicely states, "The evidence I have seen tends to support the conclusion that centralization costs more. The added administrative costs are frequently considerable and the decision often take no notice of different conditions in different institutions."

In the 1974 Self-Study of Miami-Dade, it was recommended that "there should be wider faculty participation in academic affairs such as admissions, degree requirements, . . . programs of instruction, . . . etc.," (1974 Self-Study, Miami-Dade Community College, page 73). The increasing emphasis on a macro-system concept frustrates efforts at attaining this desired goal. The costs that result from increasing centralization of authority are real and growing.

THEME: THE GROUND RULES KEEP CHANGING

Gennet: (Re: implementation of a new disciplinary system) "We'll also have to be watching very closely in terms of updating to keep it in line with new interpretations of the law. . . once you create a system, you've got a real maintenance factor which is also energy consuming."

Kelly: "One of the more discouraging things about this process is that, almost without fail, in each issue of The Chronicle of Higher Education mention is made of the fact that some portions of the Buckley Amendment are subject to change in the Congress. Any one of the changes could again seriously alter the approach that the college takes to implementing the Buckley Amendment."

Losak: ". . . even though definitions come forth very clearly, the rapidity with which they change can be disconcerting. The best example is in the definition of ethnic categories. . . if one changes each year the definition, you have to revise your entire system. Then you don't have a benchmark . . . and data is very difficult to compare . . . It doesn't permit comparability overtime."

Stewart: ". . . some of the regulations have changed several times, and we have been telling veterans one thing and the next week or next month they are changed again."

Schinoff: "Every time you get a form and fill it out, there's another revision. . . and just all kinds of categories that have changed a couple of times in the last few years."

Mehallis: "One of the most frustrating state regulations is the change in process for the community instructional services program over the past three years." (See Mehallis chart)

McFarland: "The standards for academic progress which had been previously imposed and initiated in our Spring term were completely changed as a result of the 1976 legislation."

Nicely: "Besides the problem of the initial formulation of the requirements, the state very often modifies requirements. Sometimes these modifications may seem very simple to the state, but they might require many, many man-hours of programming changes to make. For example, alternating two columns on a printout, just changing their location. It seems very simple to the state, but because of cascading effects from program to program, that change might be very, very complicated to make, and costly."

THEME: THE PROBLEM IS NOT WITH THE OVERALL GOALS AND CONCEPTS, BUT WITH THE PROCESS AND ITS DETAIL.

Gennet: "The problem I see with the implementation of so many of these regulations is not their direction, nor is the germ of the regulation or legislation necessarily wrong or inappropriate. Without fail, I see the purpose as being a positive one. Unfortunately, it's the bureaucracy, the procedure, the implementation, and the reporting of that regulation which almost negates the good intent of the regulation itself."

Gennet: "I think that the procedures and the implementation of some of these regulations are so onerous, even though they are well-intentioned, that in the name of institutional survival, people spend their time trying to figure out how they can get around the regulations and, therefore, such action defeats the purpose of the regulation itself."

Losak: "I think the essential issue is perhaps not of usefulness as such, but of the manner in which and the timeliness with which the regulations require the reporting of the data."

Losak: "I should make it clear, "I'm not in disagreement with a lost of the main concepts involved. . ."

Stewart: "I really think the idea behind the changes was a good one, that we want to make sure that essentially the veterans are making progress. I think the way it was done is really overkill."

Schinoff: "I think some of the concepts behind them are of value. I think some of the people get carried away with the reporting . . . I think some of the basic philosophy behind these regulations . . . is good . . . But they got carried away with the way they went about it in some of the details and forms."

Mehallis: "Oftentimes we have found regulations to be very nebulous, thusly, requiring interpretation from those responsible for developing the process."

Stokes: "My greatest concern is that frequently guidelines for reporting have exceeded the original intent of the legislation."

Nicely: "With regard to state requirements, the two . . . that have given us the most grief: one is cost analysis, the other is student follow-up and placement. Both of these requirements, by the way, I believe in philosophically. . .The problem is, the state defines, at least in the case of cost analysis, requirements to a detailed level, far more detailed than the state needs and far more detailed than we can use here at the college."

Nicely: "Usually I find myself in complete support of the objective, for example EA/EO."

Nicely: "In the case of EA/EO, I think the objective is noble and I support it fully."

THEME: DEADLINES ARE OFTEN UNREALISTIC. THEY FORCE YOU TO CURTAIL OTHER ACTIVITIES. SOMETIMES MATERIAL COMES LATE AND A SUPPOSED PERIOD AVAILABLE UNTIL THE DEADLINE IS, THEREFORE, MUCH REDUCED (I.E. OFTEN MANY DAYS OF THE PERIOD PRECEDING THE DEADLINE HAVE ALREADY EXPIRED WHEN MAIL REACHES COLLEGE.)

Brezner: ". . . one of the Federal grants for which we were eligible could not be completed in sufficient time in order to enable us to receive the money."

Denise Hahn (in Corseri's "Coordination" report): (responding to a statement that there is a lack of coordination between government agencies' calendars, a factor that tends to create or exacerbate deadline problem) "There should be an annual calendar of dates for data requests." Also: "Last year HEW requested from us a report in mid-September that had an October 1 deadline."

Losak: ". . . often in order to meet certain time requirements we have to have emergency programming. That then disrupts other components of the college. . . if the time requirements and constraints were more flexible, these data collecting and reporting activities would not have as powerful an impact."

Mehallis: "Where unrealistic deadlines are imposed on an office it disrupts the work routine and priorities not only in the office responsible for the completion of the report but in a multi-campus operation such as Miami-Dade it imposes hardships on the campuses which have to provide data."

THEME: VARIOUS REGULATIONS MAY OVERLAP OR CONFLICT, CAUSING A QUANDARY TO THE COLLEGE ADMINISTRATOR AS TO HOW TO PROCEED. CONFLICT IS OFTEN BETWEEN STATE AND FEDERAL LEVELS.

Kelly: (Re: Buckley Amendment) "The situation in Florida was a nightmare; and it was only in this past legislative session (1977) that the state passed a bill entitled Student Records, Chapter 77-60 (SB 359) which was an attempt to align the state law more with the Buckley Amendment."

Kelly: "Due to the utter absurdity between the Buckley Amendment and the state requirements, the college had to really disregard both sets of rules, regulations, and guidelines. We had to adopt a common sense approach to dealing with the topic of records release until such time as the state and federal gov rnments could get reasonably closer together."

Losak: (Re: Duplication) "This problem has come to the front on a number of occasions. This is particularly the case when there's a conflict of state and federal regulations with regard to definition of terms. . ."

Losak: "Oftentimes the lack of coordination between state and federal regulatory agencies."

Mehallis: "Oftentimes in reporting we have found conflict in code numbers or programs or courses. I'm speaking primarily of vocational education courses. There are many courses and programs for which neither the state nor the national office has assigned code numbers."

Holladay: "Also it is a problem to us at times that HEW and the Labor Department are not at all coordinated. I think we're seeing efforts now to do that, but at the present time and up to this point, they haven't been coordinated where we may be answering here and may be

having problems with another agency of the government on the same thing, and those agencies do not accept each others data."

Nicely: "Conflicts in procedures with such conflicts being between state agencies, between federal agencies, or occasionally between state and federal agencies."

Nicely: "The conflicting federal requirements which relate to what can be asked a person before and after he's hired, make it very difficult to implement EA/EO in a reasonable way."

Nicely: "The federal bureaucracy and the state bureaucracy are both organized with an overlap which gives rise to conflicting requirements. This overlap is in the area of vocational education. I can best illustrate it at the state level. There are four divisions: the Division of Elementary and Secondary Education, the Division of Community Colleges, the Division of Universities, and the Division of Vocational Education. It turns out that the Division of Vocational Education cuts across the first two. Secondary and Elementary as in the case of Dade County, and the Division of Community Colleges as in the case of Duval County. This same overlap, as I indicated earlier, occurs in the federal bureaucracy. (See Corseri's report: "Miami-Dade in the Middle")

THEME: REQUIREMENTS ARE OFTEN OPEN TO INTERPRETATION. AT AN INSTITUTION AS LARGE AS MIAMI-DADE IT IS DIFFICULT TO ARRIVE AT A SINGLE INSTITUTIONAL INTERPRETATION OR RESPONSE, AND, THEREFORE, A SINGLE INSTITUTIONAL POLICY. THE MULTI-CAMPUS REALITY EXACERBATES THIS PROBLEM. THE RESULT IS: INCREASED CENTRALIZATION AT THE DISTRICT OFFICE AS A PROCEDURE TO UNIFORMLY DEAL WITH THE REQUIREMENTS. FURTHER, THE MORE REQUIREMENTS (AND, THEREFORE, THE MORE NEED FOR UNIFORM POLICY RESPONSE), THE MORE CENTRALIZATION AT THE COLLEGE.

Kelly: ". . . I have been required to dig into the mass of confusion and try to make some sense out of it. It has forced my office to become the decision-making office in many questions regarding the Buckley Amendment throughout the institution."

Kelly Memo (Jan. 16, 1976): (Re: Buckley Amendment) ". . . most colleges and universities are actually awaiting more detailed guidelines to how to interpret the present federal law. These have not yet been issued and their importance is paramount in trying to implement a complete compliance program with the state and federal laws in this regard.

". . . Since Miami-Dade is so large and has so many new students in each semester, an advertisement process, collection of forms, coding of forms and recording student data information must constantly occur."

Al Smith: "The placement and follow-up requirement imposed upon the institution by legislative action a few years ago has resulted in considerable administrative time being consumed and meetings where the participants were groping to determine what the state really wanted in this area."

Schinoff: ". . . the more things that are spelled out creates more problems for interpretation and appeals because everyone interprets words differently."

Schinoff: "I think it's more difficult because we are a multi-campus and we have in my area four deans that we try to get together to agree on something so we can go with one institutional policy.

Mehallis: "A good example of centralization is the advent of having to formulate a campus-wide continuing education committee to cope with the standardization of reporting, articulating course offerings, and fee structure."

McFarland: (This is an especially good example of centralization) ". . . the job is done through team effort. . . I am referring to the Financial Aid Coordination Committee, which is most significant in the management of financial aid funds throughout the institution . . . general management is accomplished at the District level. . ."

McFarland: (This is an especially good example of centralization) "The Educational Amendments (of 1976) required the campuses to develop plans for increased consumer information. . . Currently our campuses are working on their programs with the objective that the Financial Aid Coordination Committee will eventually take the campus plans and integrate them into an institutional plan to improve consumer information."

McFarland: "I chair, as District representative and College Director, the Financial Aid Coordination Committee which is composed of the four financial aid directors on our campuses. Much of the procedure and policy is developed by this committee and through their coordination system on each campus approved up through the campus vice presidents before procedures and policies are finalized. Much of the work is done by this team, meeting as a group."

THEME: DEALING WITH REGULATIONS AND REPORTING REQUIREMENTS MOVES THE ADMINISTRATOR'S FOCUS OF ATTENTION FROM PEOPLE (AND) TO PAPER.

Kelly Memo (Jan. 6, 1976): (Re: Buckley Amendment) "The second area of concern is the need to keep accurate records of what information is released by the various custodians of records that we have at the institution and filing this information in the student folder; again, more time, more effort on filing, and keeping track of forms, etc."

Al Smith: ". . . if the institution wishes to participate in . . . (Federal aid) programs, it must go through the giant paper mill which seems to accompany each and every grant regulation. . . The state's requirement on the retention of records has literally inundated the institution with old records of all kinds being stored throughout the institution with practically no storage space available."

Stewart: "It's just that all the regulations and the red tape and the paperwork just seem like once again an overkill for them as well as us."

Schinoff: "I know one thing, I wouldn't be talking to pieces of paper, I would be dealing with students and with faculty. . ."

Stokes: (Re: curtailment of other activities due to regulations) "I have found that I cannot devote the necessary time to the activities which could have a more significant impact upon student learning."

THEME: IT IS OFTEN NECESSARY TO SEEK CLARIFICATION OF REGULATIONS FROM AN ATTORNEY (A COST FACTOR). (ALSO: MANY ADMINISTRATORS NEED TO ACQUIRE LEGAL KNOWLEDGE ON THEIR OWN.)

Kelly: ". . . what is emerging is a new requirement to be a quasi-legal authority on all existing federal and state laws, with some indication of where they may change, and what new trends prevail regarding legislation. It also certainly requires someone who has responsibilities like mine to become very well acquainted with and to work very closely with the college attorney. More and more reliance on advice from the college attorney relative to existing laws is absolutely essential. All this suggests some very different skills by someone coordinating student affairs that would not have existed five years ago." (Kelly then cites examples p.3)

Freeman: "Further, we may interpret a regulation one way and later learn that the state or federal rules apply or implement the regulation differently."

Schinoff: "I consult our college attorney a lot on clarification (especially about) things the courts have said recently."

Mehallis: "One of the most difficult roles of my job is keeping current with the federal legislation that impacts directly the programs for which this office is responsible. For example, Title 2 of the Education Amendment of 1976, and the Comprehensive Employment and Training Act (CETA)."

Traylor: "We have found that the guidelines for interpreting such legislation seem confusing and do not shed much light upon the legislation they seek to make more operational. . . there appears to be a need to simplify many of the reporting requirements in language that is understandable."

McFarland: "Considerable time has been spent by this office working with the college attorneys in determining how the V.A. regulations affect institutional liability. . . our attorneys continue to disagree with the concept of the V.A."

THEME: ADMINISTRATORS OFTEN DO NOT KNOW WHAT GOVERNMENT AGENCIES DO WITH DATA THAT THEY HAVE REQUIRED THE COLLEGE TO COLLEGE. THERE IS LITTLE FEEDBACK.

Brezner: "Some of the reports are, I think, of no discernable use to the government body that initiated them . . ."

Smith and Skidmore: "We wonder sometimes if the information we hand over really gets used."

Smith and Skidmore: "We really don't get much feedback from either the state or the federal governments on what happens to any of this data. We never see results. If we got data back we'd pass it along; but we don't. . . feedback is virtually not there on what happens to the information."

Losak: "I have some doubt that there are enough people in the legislative and court bodies to review the thousands of pages of data, however. It's difficult to see how they could expend sufficient time and energy to absorb so much data."

Al Smith: The activities required with regulations often are perceived to be of "limited use to the government body in that the massive, voluminous response could not possibly be covered by the governmental agency involved."

Schinoff: "I don't know what the Archives Bureau is going to do with all these reports."

Schinoff: "I felt very frustrated for the people who had to fill out all these forms that no one even looked at . . ."

Mehallis: "On many occasions I have attempted to interpret feedback data from both state and federal levels only to find it meaningless because in almost every case the data is at least two years old."

Holladay: ". . . some of the reports that are required . . . sometimes seem to us to be just an exercise in futility . . . It does seem to be excessive bureaucratic reporting in some of this."

THEME: REGULATION LIMITS INNOVATION

MacIver: "The administration. . . of many a state institution is under strong pressure all the time to play down all non-conformity."

Kelly: "If there is a single change in the function of chief student affairs officers or people who deal in the leadership area of student personnel services, it has been the shift away from developing, implementing and evaluating programs which are created at the institution. The emphasis now strictly is a reactionary one; that is, trying to respond to various pieces of federal and state legislation in the area of student's affairs to make certain that the institution is in compliance."

Schinoff: ". . . a lot less flexibility in being able to make decisions without referring to a policy manual or procedures manual."

Mehallis: "A recent state regulation imposed on community colleges requires that all new occupational programs receive a prior review by the state based on a seven point criteria. This state review must be approved by the local board of trustees before its implementation. The process is cumbersome, time-consuming, and infringes very heavily on the manpower resources of the institution. In the past the burden of proof to establish a need for a program was that of the industry, business, or profession requesting the program."

McFarland: (Re: V.A. regulations)". . . these regulations . . . are infringing on academic and administrative policies of all of our educational institutions."

McFarland: "We no longer control our own activities as far as veteran students are concerned."

THEME: A REGULATION, ONCE ESTABLISHED, CAN SET A PRECEDENT FOR FURTHER REGULATION. THERE IS A GROWING CONCERN THAT THE MOMENTUM OF REGULATION (OF THE EARLY 1970S) HAS AN INTRINSIC FACTOR OF CONTINUAL EXPANSION.

Brezner: "I began my present job as Director of Facilities Planning and Director of Planning for Budgeting in 1974. At that time we had approximately four reports that had to be turned in to the state on an annual basis. Since that time the number has increased to approximately fifteen reports."

Skidmore and Smith: "I think the major way my job has changed is simply in terms of volume. The number of state and federal reports that we are asked to complete each year has expanded greatly."

Skidmore and Smith: ". . . this whole process at the college began in 1975 when we put together a voluminous Equal Access plan and ever since that time there have been many offshoots of that."

Losak: ". . . state and federal regulatory requirements have become geometrically disproportionate in terms of their growth in the last 5 years. There are so many spinoffs of requirements having to do with such matters as the Office of Civil Rights, placement and follow-up efforts, etc. . . ."

LaRoue: "The big year was 1972 when the state started its cost analysis system (MIS) work. The volume of reports rapidly expanded and has continued to increase."

Zeien: ". . . the process of implementing a new regulation is involved. It's not something that comes in and leaves after a period of time. It continually builds up."

Mehallis: "A good example of this theme is the community instructional services program."

McFarland: "The G.I. Bill was modified in the last minutes of the 94th Congress before they convened in October, 1976. As a result of the 1976 legislative modifications, the V.A. has inundated colleges and universities with dozens of circulars and hundreds of pages of regulations, and these regulations increase the burden of reporting and they are infringing on academic and administrative policies of all our educational institutions."

THEME: REGULATION CAN, IN FACT, SHAPE
A JOB AT THE ADMINISTRATIVE LEVEL.

Gennet: ". . . in the last seven years, by being involved with student development, I think I have become not only aware of the increase in federal regulations during that time period, but I've also become aware as to the extent to which they have, in fact, shaped my position."

Losak: "A major imposition from regulatory agencies comes from the state enforcement of placement and follow-up regulations . . . we've hired a full-time person to direct these efforts. It's my judgment that at least 3/4 of the professional's time is spent on placement and follow-up efforts. At least 1/2 of the secretary's time is spent on state and federal reporting. At least 60-70% of the time of another clerical support person is spent in filling out state and federal regulation forms. . . I'd say that at least 1/4 to 1/3 of my own time is spent in various ways with state and federal regulatory impingements."

Brezner: "There is also the facilities inventory update which is completed by Mr. Burke. These reports require an enormous amount of time and effort . . . You can consider that approximately $8,000 is allotted at $60 an hour for Mr. Burke to complete these reports."

Losak: ". . . we've hired a full-time person to take care of placement and follow-up efforts in the state of Florida."

Al Smith: "I have come to accept living with these regulations and reporting requirements as a way of life. . ."

Freeman: "The majority of my time is spent within the framework of laws, regulations, and due process procedures to insure college compliance with federal and state regulations."

McFarland: "Prior to 1975 approximately 10% of my time was devoted to veterans affairs. This has now increased to approximately 50% of the time. This is as a result of the very heavy increase in administrative workload resulting from the hundreds of pages of regulations I referred to which the V.A. has imposed on all educational institutions."

THEME: DECISIONS ARE MORE DIFFICULT AND LONGER IN THE MAKING AS A RESULT OF EXTERNAL REGULATION.

Gennet: ". . . in making a decision today, in 1977, as opposed to 1970, the administrator must be much more conscious not only of what the internal critics within the institution are thinking. . . but also, increasingly, decisions are impacted and very often delayed by dealing additionally with external critics who impose their own sets of expectations."

(See Mehallis Chart)

THEME: ATTENTION OF MANY COLLEGE ADMINISTRATORS HAS SHIFTED FROM INTERNAL CONCERNS TO EXTERNAL CONCERNS.

Kelly: "If there is a single change in the function of chief student affairs officers or people who deal in the leadership area of student personnel services it has been the shift away from developing, implementing and evaluating programs which are created at the institution. The emphasis now strictly is a reactionary one; that is, trying to respond to various pieces of federal and state legislation in the area of students' affairs to make certain that the institution is in compliance. It is a dramatic shift in roles and responsibilities! No longer is it an inward-looking responsibility but more of an outward-looking responsibility; that is, simply to try to keep the house in order in regard to the great myriad of laws, regulations, procedures, and guidelines that have come forth from the federal and state governments."

Schinoff: (Re: destruction of records) "I don't think we need to send the thing up to the Archives Bureau up in Tallahassee, and ship cartons up to them and receive permission to have them destroyed. I think we could do that internally, very easily. . ."

Mehallis: "In order to keep current with new developments and changes in legislation it is almost imperative to get involved with professional organizations and agencies outside the institution."

Gennet: (Re: administrative decision making) ". . . it has become so complex . . , not because of anything inherent within the institution, but because of external expectations that the administrator must confront, so that in making a decision today, in 1977, as opposed to 1970, the administrator must be much more conscious not only of what the internal critics within the institution are thinking . . . but also, increasingly,

decisions are impacted and very often delayed by dealing additionally with external critics who impose their own sets of expectations."

THEME: IMPACT OF REQUIREMENTS ON ATTITUDE OF COLLEGE STAFF

Kelly: "One of the most ironic features of the great promulgation of federal and state laws, regulations, guidelines and procedures has been the impact they have had on one's attitude in relation to one's respect for the law. Personally, the net effect of all this great excessive regulating has caused me to become very cynical and somewhat nonresponsive to institution requirements. For example . . ."

Smith and Skidmore: "It's very difficult . . . to get people on the campuses to respond when they've done it a thousand times before, when they don't see any useful need or benefit coming out of it. You get a situation where people are reluctant to give you the information. And then you have to keep contacting them. It doesn't work well that way."

Holladay: ". . .I do detest and dislike having to fill out forms and provide voluminous amounts of data like on complaints and so forth when it appears the complainant in the first place doesn't really have a lot of substance."

McFarland's 2nd V.A. interview: "I think I've already made the case quite clear that the legislation and the regulations of the V.A. has made my job very difficult, very complex, and on many occasions distasteful because of the discrimination of the veterans, and I think this is also true throughout the entire institution as far as all are concerned with veterans' services."

THEME: THERE ARE SO MANY REGULATIONS AND REQUIREMENTS THAT TO RESPOND TO THEM ALL EFFECTIVELY IS DIFFICULT OR IMPOSSIBLE.

Kelly: ". . . in the last two years there have been so many laws that have been passed which simply cannot be implemented at our college. Thus, you find yourself in a situation where this is clearly the law; this is what the institution is obliged to do; and yet there is no way in which the institution can respond. It is either a law that is not practical; a law that cannot be reasonably implemented because of the astronomical cost involved; or it is a provision that simply is outside of the capacity of the institution to respond . . . It really doesn't matter how many laws come down---we can only implement and respond to those that are reasonably practical and for which the institution has some expectation that it can meet the requirement." (Kelly cites some examples, such as 85/15 Rule of V.A., as not implemented pieces of legislation.)

Dannelly: "Some of the information that they want us to provide is unrealistic. They make unrealistic clerical demands on us."

Mehallis: "Whether the administrator likes it or not he is held responsible for keeping abreast of changing regulations and new regulations. On behalf of the institution he must respond to these regulations to the best of his abilities given the resources available."

Holladay: "The EA/EO Program has had priority and consequently, we have dropped off other things, maybe the writing of policies and handbooks and some other things that we feel are very important, but they're on the back burner at this point because we simply don't have the time."

THEME: DIFFERENT GOVERNMENT AGENCIES WANT THE SAME OR SIMILAR DATA BUT OFTEN THEY USE DIFFERENT FORMATS FOR REQUESTING THE DATA, CAUSING MUCH DUPLICATION.

*Denise Hahn (in "Coordination" report by Corseri): "Many agencies want the same or similar data. Yet, none of the agencies use the same format for requesting the data."

Smith and Skidmore: ". . . a study was being done to determine whether we could establish a state-wide system for management information systems to be useful to all the colleges so that data could be collected in one form and used uniformally throughout the system to avoid this duplication. So far, that hasn't happened."

Smith and Skidmore: "Another problem is that very often you'll get asked for the same or similar information in a different format . . . That requires re-programming and valuable time is lost."

Smith and Skidmore: "The biggest frustration is the duplication."

Losak: "You have to adjust the computer programming research when a term is operationally defined differently by one agency versus another. That's a waste of time and effort on everyone's part. There needs to be more work done to get better coordination."

Schinoff: "Every time we turn around, we're not giving the data in the exact format someone wants it, or the exact data elements someone needs, they want a new data element."

THEME: THERE ARE HIDDEN COST FACTORS
DIFFICULT TO ASSESS

Losak: "There are so many spinoffs of requirements that the dollar impact on the institution is extremely difficult to assess. But, in addition to the dollar impact, it is also clear that there are educational decisions being made on the basis of some of these regulations. One might even say that that is a more serious area of concern. I think to some extent the directions that are being taken are directed by some of the regulations that have come from the federal and state governments."

Mehallis: "When I have to rely on people from other campuses, departments, or divisions for data it is very difficult to determine the man-hours expended in gathering the data and try to relate this to the cost factor. One develops a consciousness that when a report reaches his desk he can't but help ask himself: "I wonder what the cost factor to complete this report will be?"

McFarland: ". . . preparation as chairman might require 3, 4 or 5 days according to the complexities of the subjects we are to discuss at the meeting."

(See Corseri's report: "The Hidden Cost Factor at the Administrative Level")

THEME: AT THE CAMPUS LEVEL THE IMPACT OF STATE AND FEDERAL REGULATIONS IS FELT MORE DIRECTLY THROUGH THE IMPLEMENTATION OF ADDITIONAL COLLEGE PROCEDURES AND ORGANIZATIONAL STRUCTURE WHICH WERE DEVELOPED TO RESPOND TO THE ADDED REQUIREMENTS IMPOSED AT A STATE AND FEDERAL LEVEL. THUS, THE FOCUS OF CRITICISM AT THE CAMPUS LEVEL MAY BE INACCURATELY DIRECTED BY SOME PEOPLE TO THE INSTITUTION, WHICH IS REALLY ONLY AN INTERMEDIARY IN THESE CASES.

Mehallis: "Oftentimes in completing reports it is necessary to rely on people on other campuses, and depending largely on meeting the deadline, this has caused many anxieties on the various campuses and antagonisms toward Centeral Administration."

THEME: UNCERTAINTY OF GOVERNMENT MONETARY INPUT CAUSES DIFFICULTIES FOR PLANNING.

Al Smith: "The state funding formula and its massaging annually by the Division of Community Colleges, keeps the District and campus administrators in a state of limbo for several months; thus, planning for staff and the operation of the campus is greatly impaired."

Mehallis: "Where federal projects are funded piecemeal, this leads to an insecurity on the part of the project director and those involved with the project. It places the administrator in the position of begging for verbal promises of funding in order to bring the project to completion." (See Miami-Dade Budget Message 1977-78, Page 1)

THEME: AS A RESPONSIBLE INSTITUTION, WITH A FINE RECORD OF COMPLIANCE WITH THE LAW AND SOCIETAL NEEDS, GOVERNMENT DEMANDS FOR THE COLLEGE'S ACCOUNTABILITY SEEM TOO DEMANDING. THERE IS TOO MUCH "OVERKILL."

LaRoue: (Re: EA/EO requirements) "This community college has been doing a good job in this area all along. I think it is a requirement imposed on everybody (all colleges) because a few institutions have not done the job. This hurts the college to have to expend the additional funds to prove that we are already doing a good job."

Stewart: "It's just that all the regulations and the red tape and the paperwork just seem like once again an overkill for them as well as us."

Schinoff: "I think a myriad of regulations that really wasn't needed was the records staff on the Buckley Amendment."

McFarland: "It has become evident . . . a few veterans and a few educational institutions were abusing the benefits authorized under the improved G.I. Bill and the V.A. regulations. In 1975 the V.A. launched a campaign to correct the few abuses through continuous and pervasive regulations imposing numerous restrictions and extensive reporting procedures on all educational institutions enrolling veterans. The V.A. has intruded into management of higher education infringing on institutional prerogatives and seriously limiting the services to veterans as intended by legislation of the U.S. Congress. The cumulative effect of V.A. regulations is significant discrimination against veteran students who can no longer pursue a higher education under the same academic standards prescribed for all other students."

McFarland: (Re: 1976 legislative changes) "It rejects reliance on institutional judgment and policy and seeks to impose another layer of bureaucracy."

McFarland: "Another controversial issue is the 85/15 Rule which prohibits educational benefits for courses where more than 85% of the students are G.I. Bill beneficiaries or federal grantees. . . Initially the G.I. Bill included this 85/15 Rule to prevent proprietary colleges from continuing to exploit veterans benefits for higher education. However, the 1976 legislation extended this to all colleges and universities in our view without any foundation."

Nicely: "Because our systems are so efficient, we have always found ourselves way below the allowable square footage which the state would permit using the standard formulas." (And yet a burdensome report is always required--Corseri.)

See Miami-Dade Budget Message 1977-1978, Page 15.

THEME: GOVERNMENT REGULATION HAS RESULTED IN DISCRIMINATION AGAINST CERTAIN CATEGORIES OF STUDENTS.

McFarland: "The standards for academic progress which had been previously imposed and initiated in our Spring term were completely changed as a result of the 1976 legislation. This legislation required institutions to develop new standards of progress for approval by state agencies and the V.A. No longer would veterans have their cumulative grade point averages recalculated with zero credits for withdrawals, incompletes or audits. Such grades automatically result in an overpayment under the new regulations; therefore, the veteran automatically owes a debt which he must pay the V.A. This conceivably could encourage veterans to opt for F's to obtain benefits while other students will receive W grades without jeopardizing their academic standing. Thus, veterans will be judged by different academic criteria than other students including recipients of other forms of federal aid in the same course of study.

THEME: DATA COLLECTION REQUIREMENTS BY GOVERNMENT OFTEN OCCURS TOO FREQUENTLY

Nicely: "In the area of student follow-up and placement, my main quarrel is with the frequency of data collection. My recollection is that the state requires this information annually, which is absurd. My own feeling is that probably a sampling every three or four years would be adequate to detect the kinds of trends that we should know about."

THEME: IF THE DATA CANNOT BE UTILIZED BY THE COLLEGE IT IS UNLIKELY TO BE USABLE BY A GOVERNMENT AGENCY.

Nicely: "The problem is that the state asks for facilities utilization information which is in a form completely unusable to us and thus, I trust, completely unusable to the state."

Nicely: "Even in cost analysis data, the way we present it to the state is different than the way we prepare it locally so that the campus vice presidents can determine what's going on . . . The cost analysis data as required by the state can thus be very misleading. After preparing the cost analysis data for the state, using the procedures required by the state, we redo it for Miami-Dade, using average faculty salaries."

THEME: GOVERNMENT AGENCIES OFTEN REQUEST DETAIL AT A LEVEL FAR GREATER THAN NECESSARY.

Nicely: "Request for detail at a level far more detailed than is required by the requesting agency. A perfect illustration of this is. . . cost analysis, where the state asks for costing data at the discipline level (where funding occurs), at the subdiscipline level, and at the course level."

Nicely: (Re: Cost analysis) "At lower levels, I am convinced that it is of no value to the state, and just adds an additional tax burden to collect this information and store it indefinitely in Tallahassee."

COST DATA

In the early part of 1975, Miami-Dade Community College was asked by the American Council on Education (ACE) to participate in undertaking two studies of special costs which bear on overall financial conditions of institutions of higher education.

The first was a preliminary study of the costs incurred by colleges and universities in complying with the range of federally mandated social programs enacted during the late '60's and early '70's. These programs include:

Affirmative Action

Occupational Health and Safety

Environmental Protection

Equal Pay

Social Security Tax Increases

Increases in the level and coverage of Minimum Wages, and

Unemployment Compensation.

The second study related to institutionally-funded student financial aid which is a significant factor in educational and general costs at many schools. This study was intended to develop detailed information on the sources and uses of funds awarded, by purpose and by type of student.

The American Council on Education strongly endorsed the positive intent of each of these programs; however, they recognized that implementing them often involves costs to the institutions which are not taken into explicit account in the provision of financial support. Concern over legislated cost increases caused members of the Congress to seriously question conditions in higher education. In order to provide members of the Task Force on the Higher

Education Amendments of 1975 with meaningful data for their spring 1975 meetings, ACE undertook this study formally titled "Costs of Implementing Federally Mandated Social Programs at Colleges and Universities."

Attached are copies of the charts Miami-Dade completed for the first study which show in detail a breakdown of the costs the College has incurred for each of the specific programs being studied. These figures go back over several years and clearly show how significantly costs have increased for these programs.

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

ogram: AGE DISCRIMINATION

MIAMI-DADE COMMUNITY COLLEGE

ase See Instruction Sheet For Classification of Categories

ogram Description: The Employment Coordinator under the direction of the Director of Personnel has conducted an aggresive program to assure that age is not a factor in consideration for initial employment or in the subsequent promotion or transfer of employees.

ES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have done this on its own Initiative?: Yes	5) Would Institution have done this on its own Initiative?: No
(E. 4/7															
'3/74	Monitoring development of Legislation and Regulations	2% of Director of Personnel s Salary	$126.		X			X	X			X			X
		Office Overhead and Operating Expenditures	9.		X					X		X			X
	Examination of retirement policies	4 days of Director of Personnel's Salary	413.	X				X	X			X			X
74/75	Monitoring development of Legislation and Regulation	2% of Director of Personnel s Salary	540.		X			X	X			X			X
		Office Overhead and Operating Expenditures	28		X					X		X			X
		Reference Material	121.		X			X	X				X		X

Respondent W. G. Holladay

Title Director of Personnel

Telephone 305 - 274-1171

FEDERALLY-FUNDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: Minimum Wage Provision

MIAMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

Program Description: It has been the policy of this institution to maintain all minimum wages at 10 to 15 percent above the minimum wage provision of the Fair Labor Standards Act as amended.

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Would Institution have done this on its own initiative?: Yes	Would Institution have done this on its own initiative?: No
				DATA CODE (Please "X")											
68/69	Monitoring development of Legislation and Regulations	10% of Wage Administrators Salary	$1,100.		X		X			X		X			X
		Office Overhead and Operating Expenditures	163.		X					X		X			X
69/70	Repeat	10% of Wage Administrators Salary	1,250.		X		X			X		X			X
		Office Overhead and Operating Expenditures	163.		X					X		X			X
70/71	Repeat	10% of Wage Administrators Salary	1,400.		X		X			X		X			X
		Office Overhead and Operating Expenditures	163.		X					X		X			X
		Resource Material	68.		X		X		X				X		X
		Updating College Policy & Procedure to comply with act	120.		X		X			X		X			X
71/72	Repeat	10% of Wage Administrators Salary	1,470.		X		X			X		X			X
		Office Overhead and Operating Expenditures	163.		X					X		X			X
		Resource Material	68.		X		X		X				X		X
		Updating College Policy & Procedure to comply with act	120.		X		X			X		X			X

Respondent H. G. Holladay

Title Director of Personnel

Telephone 305 - 274-1171

FEDERAL-STATE-LOCAL POSTSECONDARY PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: MINIMUM WAGE PROVISION - Page 2

MIAMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	(1) Nature of Cost: One Time	(1) Nature of Cost: Annual	(2) Benefit to the Institution: No direct benefit	(2) Benefit to the Institution: Some	(2) Benefit to the Institution: Substantial	(3) Degree of Confidence in Data Provided: Actual Cost	(3) Degree of Confidence in Data Provided: Estimate - Speculation	(4) Cost due to Compliance: Definitely	(4) Cost due to Compliance: Questionable	Would Institution have done this on its
				DATA CODE (Please "X")									Yes
1972-73	Repeat	10% of Wage Administrators Salary	$1,558.		X		X			X			
		Office Overhead and Operating Expenditures	163.		X					X			
		Resource Material	68.		X				X				
		Updating College Policy & Procedure to comply with act.	120.		X		X			X			
1973-74	Repeat	10% of Wage Administrators Salary	1,690.		X		X			X			
		Office Overhead and Operating Expenditures	163.		X					X			
		Resource Material	68.		X				X				
		Updating College Policy & Procedure to comply with act.	120.		X		X			X			
1974-75	Repeat	10% of Wage Administrators Salary	1,838.		X		X			X			
		Office Overhead and Operating Expenditures	163.		X					X			
		Resource Material	68.		X		X		X				
		Updating College Policy & Procedure to comply with act.	120.		X		X			X			

Respondent W. G. Holladay

Title Director of Personnel

Telephone 305 - 274-1171

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

DATA COLLECTION SHEET

Program: SOCIAL SECURITY

MIAMI-DADE COMMUNITY COLLEGE

Note: 12/70 and 7/1/72 and 1/75 Instructors given opportunity to change to Social Security from Teacher's Retirement.

Please See Instruction Sheet For Classification of Categories

Program Description: The Social Security Program has concentrated on keeping employees fully informed on their social security work credit and benefits. Example; How to determine if you are insured; amounts of monthly payments; disability payments and family payments.

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate - Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Could Institution Have this on its Own Initiative?: Yes	Could Institution Have this on its Own Initiative?: No
				DATA CODE (Please "X")										
1970	Increased amount forwarded to Social Security (employer contribution)		$47,688		X	X			X		X			X
1971	Repeat		268,761		X	X			X		X			X
1972	Repeat		117,898		X	X			X		X			X
1973	Repeat		188,258		X	X			X		X			X
1974	Repeat		148,765		X	X			X		X			X

Respondent W. C. Holladay

Title Director of Personnel

Telephone 305 - 274-1171

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: WAGE AND SALARY CONTROLS

MIAMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

Program Description: Liaison was maintained with the local IRS Office to obtain interpretation of executive directives and to assure strict compliance with salary controls and reporting requirements.

DATES	TASK	BUDGET ITEM	COST	(1) Nature of Cost: One Time	(1) Nature of Cost: Annual	(2) Benefit to the Institution: No direct benefit	(2) Benefit to the Institution: Some	(2) Benefit to the Institution: Substantial	(3) Degree of Confidence in Data Provided: Actual Cost	(3) Degree of Confidence in Data Provided: Estimate	(3) Degree of Confidence in Data Provided: Speculation	(4) Cost due to Compliance: Definitely	(4) Cost due to Compliance: Questionable	Would Institution have done this anyway: Yes
				DATA CODE (Please "X")										
Eff. 8/15/71 71/72	Monitor development of Legislation and Regulations	25% of Wage Administrator's Salary	$3,675.		X		X			X		X		
		Office Overhead and Operating Expenditures	406.		X					X		X		
72/73	Repeat	25% of Wage Administrator's Salary	3,896.		X		X			X		X		
		Office Overhead and Operating Expenditures	408.		X					X		X		
73/74 through 1/25/74	Repeat	10% of Wage Administrator's Salary	845.		X		X			X		X		
		Office Overhead and Operating Expenditures	82.		X					X		X		
1/25/74	Exemption for Non-profit Institutions													

Respondent W. G. Hallmlay

Title Director of Personnel

Telephone 305 - 274-1171

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: UNEMPLOYMENT INSURANCE

MIAMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

Program Description: To assure all employees that are terminating employment with the institution are informed as to eligibility to apply for unemployment insurance.

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Would Institution have Done this at Its
				DATA CODE (Please "X")										Yes
74/75	Monitor development of Legislation and Regulations	1% of the Director of Employee Relations Salary	$ 220.00		X		X			X		X		
		2% of Clerical Staff Salary	127.00		X		X			X		X		
		Office Overhead and Operating Expenditures	22.00		X					X		X		

Respondent W. C. Holladay

Title Director of Personnel

Telephone 305 - 274-1171

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

rogram: AFFIRMATIVE ACTION PROGRAMS/
'UAL EMPLOYMENT OPPORTUNITY
AMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

rogram Description: The Miami-Dade Community College Board of Trustees on 7/1/68 apted the following policy"A. Miami-Dade Junior College is an equal opportunity ployer and is pledged to recruit and employ personnel without regard to race, color, creed, or national origin, in compliance with Title VI of the Civil Rights Act amended and Executive Order #11246. B. The employees of the College are expected teach or work with other employees, and to supervise or be supervised in their

con't on page 2)

YEAR	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have Done this on its Own Initiative?: Yes	5) Would Institution have Done this on its Own Initiative?: No
69-70	Administration of Affirmative Action and Equal Opportunity Programs	Salary of College Affirmative Action Officer Employed 1/70	$ 6,500.		X			X	X			X			X
		20% of Director of Personnel Salaries	4,000		X			X		X		X			X
		Office Overhead and Operating Expenditures	1,155.		X					X		X			X
		Legal Counsel	5,000.		X			X		X		X			X
		Reference Material	34.		X			X	X				X		X
		College-wide conference to advise administration of Affirmative Action-Salaries	1,450.	X				X		X		X			X
		Salaries paid to employees to work with Review Teams from HEW.	667.	X				X		X		X			X
		Toll calls by Affirmative Action Officer	22.		X			X		X		X			X
		Luncheons, Dinners, Organization dues, etc. for Affirmative Action Officer	69.		X			X		X		X			X
69/70	Designing Affirmative Action written plan	6 Administrators at $60. per day, per person (40 hrs)	1,800.	X				X		X		X			X
	Administration of Affirmative Action and Equal Opportunity Programs	Travel expenses for Affirmative Action Officer	721.		X			X	X			X			X

Respondent W. C. Holladay

Title Director of Personnel

Telephone 305- 274-1171

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FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

ogram: AFFIRMATIVE ACTION PROGRAMS/
QUAL EMPLOYMENT OPPORTUNITY - Page 2

ease See Instruction Sheet For Classification of Categories

ogram Description: work by other employees without regard to race, color, creed sex." A full-time Affirmative Action Officer was employed early in 1970 directly sponsible to the President and Executive Vice President. Contact was established th HEW Office of Civil Rights Compliance and local agencies both private and blic. The Affirmative Action Officer has worked effectively with all levels of nagement within the institution to prevent practices and procedures that could, any way, be considered discriminatory.

				1) Nature of Cost		2) Benefit to the Institution			3) Degree of Confidence in Data Provided			4) Cost due to Compliance		5) Would Institution have done this on its own initiative?	
YES	TASK	BUDGET ITEM	COST	One Time	Annual	No direct benefit	Some	Substantial	Actual Cost	Estimate	Speculation	Definitely	Questionable	Yes	No
				DATA CODE (Please "X")											
19/70	Designing Affirmative Action written plan	Printing	$ 8.	X				X	X			X			X
69-70	Recruitment	Cost to bring in Candidates	1,400.	X			X			X		X			X
	Filing of reports	Data Processing	305.		X		X			X		X			X
		Clerical Salaries 5% (1 clerk) 2% (1 clerk)	215.		X		X			X		X			X
		Annual compliance report to OCR. 2 hrs. of the Pres and Exec. Vice Pres. Sal. each year.	64.		X		X			X		X			X
970-71	Administration of Affirmative Action and Equal Opportunity Programs	Salary of College Affirmative Action Officer	$13,900.		X			X	X			X			X
		20% of Director of Personnel Salaries	4,300.		X			X		X		X			X
		Office Overhead and Operating Expenditures	1,962.		X					X		X			X
		Travel expenses for Affirmative Action Officer	1,301.		X			X	X			X			X
		Legal Counsel	10,000.		X			X		X		X			X
		Reference Material	83.		X			X	X				X		X
		Clerical Staff for Affirmative Action Officer(salaries)	4,576.		X			X	X			X			X

Respondent _____

Title _____

Telephone _____

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

ogram: AFFIRMATIVE ACTION PROGRAMS/
QUAL EMPLOYMENT OPPORTUNITY - page 3

ease See Instruction Sheet For Classification of Categories

ogram Description:

				1) Nature of Cost		2) Benefit to the Institution			3) Degree of Confidence in Data Provided		4) Cost due to Compliance		Would Institution Have Done this on its Own Initiative? 5)
				One Time	Annual	No direct benefit	Some	Substantial	Actual Cost	Estimate - Speculation	Definitely	Questionable	Yes / No
ES	TASK	BUDGET ITEM	COST	DATA CODE (Please "X")									
70-71		Salaries paid to employees to work with Review Teams from HEW.	$ 667.	X				X		X	X		X
		Toll calls by Affirmative Action Officer	43.		X			X		X	X		X
		Luncheons, Dinners, Organization dues, etc. for Affirmative Action Officer	137.		X			X		X	X		X
	Recruitment	Cost to bring in Candidates	300.	X			X			X	X		X
		Salary Adjustments to employ minorities	3,000.	X				X		X	X		X
	Filing of reports	Data Processing	610.		X		X			X	X		X
		Clerical Salaries 5% (1 clerk) 2% (1 clerk)	493.		X		X			X	X		X
		Annual compliance report to OCR. 2 hrs. of the Pres. and Exec. Vice Pres. Sal. each year.	73.		X		X			X	X		X
71-72	Administration of Affirmative Action and Equal Opportunity Programs	Salary of College Affirmative Action Officer	14,595.		X			X	X		X		X
		20% of Director of Personnel Salary	4,515.		X			X		X	X		X

Respondent _____

Title _____

Telephone _____

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FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

rogram: AFFIRMATIVE ACTION PROGRAMS/
UAL EMPLOYMENT OPPORTUNITY - page 4

lease See Instruction Sheet For Classification of Categories

rogram Description:

.TES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate - Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution Have Done this on its Own Initiative?: Yes	5) Would Institution Have Done this on its Own Initiative?: No
				DATA CODE (Please "X")										
971-72		Office Overhead and Operating Expenditures	$ 1,969.		X					X	X			X
		Travel expenses for Affirmative Action Officer	1,242.		X			X	X		X			X
		Legal Counsel	10,000.		X			X		X	X			X
		Reference Material	76.		X			X	X			X		X
		Clerical Staff for Affirmative Action Officer (salaries)	5,986.		X			X	X		X			X
		Salaries paid to employees to work with Review Teams from HEW.	667.	X				X		X	X			X
		Toll calls by Affirmative Action Officer	43.		X			X		X	X			X
		Luncheons, Dinners, Organization dues, etc. for Affirmative Action Officer	137.		X			X		X	X			X
	Recruitment	Cost to bring in Candidates	300.	X			X			X	X			X
		Salary adjustments to employ minorities	3,000.	X				X		X	X			X
	Filing of reports	Data Processing	610.		X		X			X	X			X
		Clerical Salaries 5% (1 clerk) 2% (1 clerk)	543.		X		X			X	X			X

Respondent _____

Title _____

Telephone _____

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY
DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY - page 5

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have Done this on its Own Initiative?: Yes	5) Would Institution have Done this on its Own Initiative?: No
				DATA CODE (Please "X")											
71-72		Annual Compliance Report to OCR. 2 hrs. of the Pres. and Exec. Vice Pres. Sal. each year.	$ 77.		X		X			X		X			X
72-73	Administration of Affirmative Action and Equal Opportunity Programs	Salary of College Affirmative Action Officer	15,471.		X			X	X			X			X
		20?oi Director of Personnel Salary	4,786.		X			X		X		X			X
		Office Overhead and Operating Expenditures	1,978.		X					X		X			X
		Travel expenses for Affirmative Action Officer	921.		X			X	X			X			X
		Legal Counsel	10,000.		X			X		X		X			X
		Reference Material	68.		X			X	X				X		X
		Clerical Staff for Affirmative Action Officer (salarie	4,844.		X			X	X			X			X
		Toll calls by Affirmative Action Officer	43.		X			X		X		X			X
		Luncheons, Dinners, Organization Dues, etc., for Affirmative Action Officer	137.		X			X		X		X			X

Respondent _____

Title _____

Telephone _____

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FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY - page 6

Please See Instruction Sheet For Classification of Categories

Program Description:

YEARS	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have Done this on its Own Initiative?: Yes	5) Would Institution have Done this on its Own Initiative?: No
				DATA CODE (Please "X")											
1972-73	Adjustments to Promotion Practices	50% of Director of Employee Relations Salary	$ 6,938.		X			X		X		X			X
		Office Overhead and Operating Expenditures	1,087.		X					X		X			X
	Recruitment	North Campus Black Faculty Recruitment Committee (Salaries)	2,759.	X			X			X		X			X
		Increased Advertising for Minority Recruitment	1,000.		X			X		X		X			X
		Clerical Staff Salaries and Supplies (2% of Salaries)	172.		X		X			X		X			X
	Filing of reports	Data Processing	610.		X		X			X		X			X
		Clerical Salaries 5% (1 clerk) 2% (1 clerk)	605.		X		X			X		X			X
		Annual Compliance Report to OCR, 2 hrs. of the Pres. and Exec. Vice Pres. Sal. each year.	82.		X		X			X		X			X
1973-74	Administration of Affirmative Action and Equal Opportunity Programs	Salary of College Affirmative Action Officer	$16,784.		X			X	X			X			X
		20% of Director of Personnel Salary	5,052.		X			X		X		X			X

Respondent _____

Title _____

Telephone _____

FEDERALLY-FUNDED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY - page 7

Please See Instruction Sheet For Classification of Categories

Program Description:

YES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have done this on its own initiative?: Yes	5) Would Institution have done this on its own initiative?: No
1973-74		Office Overhead and Operating Expenditures	$ 1,986.		X					X		X			X
		Travel expenses for Affirmative Action Officer	878.		X			X	X			X			X
		Legal Counsel	10,000.		X			X		X		X			X
		Reference Material	412.		X			X	X				X		X
		Toll calls by Affirmative Action Officer	43.		X			X		X		X			X
		Consultants	100.	X				X		X		X			X
		Luncheons, Dinners, Organization Dues, etc., for Affirmative Action Officer	137.		X			X		X		X			X
	Adjustments to Promotion Practices	50% of Director of Employee Relations Salary	9,998.		X			X		X		X			X
		Office Overhead and Operating Expenditures	1,090.		X					X		X			X
	Recruitment	North Campus Black Faculty Recruitment Committee (Salaries)	919.	X			X			X		X			X
		Increased Advertising for minority recruitment	1,000.		X			X		X		X			X

Respondent _____

Title _____

Telephone _____

FEDERALLY-FUNDATED SOCIAL PROGRAM COST STUDY
DATA COLLECTION SHEET

gram: AFFIRMATIVE ACTION PROGRAMS/
UAL EMPLOYMENT OPPORTUNITY - page 8

ase See Instruction Sheet For Classification of Categories

gram Description:

S	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have Done this on its Own Initiative?: Yes	5) Would Institution have Done this on its Own Initiative?: No
				DATA CODE (Please "X")											
'3-74		Clerical Staff Salaries and Supplies (2% of salaries)	$ 185.		X		X			X		X			X
	Filing of reports	Data Processing	610.		X		X			X		X			X
		Clerical Salaries 5% (1 clerk) 2% (1 clerk)	665.		X		X			X		X			X
		Annual Compliance Report to OCR. 2 hrs. of the Pres. and Exec. Vice Pres. Sal. each year.	85.		X		X			X		X			X
'74-75	Administration of Affirmative Action and Equal Opportunity Programs.	Salary of College Affirmative Action Officer	18,376.		X			X	X			X			X
		20% of Director of Personnel Salary	5,395.		X			X		X		X			X
		Office Overhead and Operating Expenditures	2,000.		X					X		X			X
		Travel expenses for Affirmative Action Officer	588.		X			X	X			X			X
		Legal Counsel	10,000.		X			X		X		X			X
		Reference Material	34.		X			X	X				X		X
		Toll calls by Affirmative Action Officer	43.		X			X		X		X			X
		Consultants	1,726.	X				X		X		X			X

Respondent _____

Title _____

Telephone _____

FEDERALLY-FUNDED SOCIAL PROGRAM COST STUDY
DATA COLLECTION SHEET

ogram: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY - page 9

ease See Instruction Sheet For Classification of Categories

ogram Description:

YES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have Done this on its Own Initiative?: Yes	5) Would Institution have Done this on its Own Initiative?: No
				DATA CODE (Please "X")											
1974-75		Luncheons, Dinners, Organization Dues, etc., for Affirmative Action Officer	$ 137.		X			X		X			X		X
	Adjustments to Promotion Practices	Cash Settlements	$11,635.	X			X		X				X		X
		50% of Director of Employee Relations Salary	10,998.		X			X		X			X		X
		Office Overhead and Operating Expenditures	1,096.		X					X			X		X
	Recruitment	Increased Advertising for minority recruitment	1,000.		X			X		X			X		X
		Clerical Staff Salaries and Supplies (2% of salaries)	202.		X		X			X			X		X
		Data Processing	610.		X		X			X			X		X
	Filing of reports	Clerical Salaries 5% (1 clerk) 2% (1 clerk)	684.		X		X			X			X		X
		Annual Compliance Report to OCR. 2 hrs. of the Pres. and Exec. Vice Pres. Sal. each year.	90.		X		X			X			X		X

Respondent _____

Title _____

Telephone _____ _____

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY
MIAMI-DADE COMMUNITY COLLEGE

(SUPPLEMENT SHEET) Page 1

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate - Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Would Institution have done this on its own: Yes	Would Institution have done this on its own: No
				DATA CODE (Please "X")										
1969-70	Administration of Affirmative Action and Equal Opportunity Programs	5% of President's salary and 10% of Executive Vice President's Salary	$4,500		X			X	X		X			X
		Office Overhead and Operating Expenditures	411.		X				X		X			X
		2% of Director of Admissions and Records and 2% of Assistant's Salary	453.		X			X	X		X			X
	Recruitment	Training a black faculty member for a major administrative roll. (salary)	$13,337.	X				X	X		X			X
		7% of Personnel Officer's Salary.	735.		X			X	X		X			X
		Office Overhead and Operating Expenditures	113.		X				X		X			X
		Recruitment by administrators, Division Directors, & Dept. Chairmen, 1% of salaries.	15,585.		X			X	X		X			X
	Systems Work Personnel/Payroll	Computer Programs, Forms, Procedures, Processes. Data Element for sex and Ethnic, (Faculty and Students)	20,000.		X			X	X		X			X

Respondent _____

Title _____

Telephone _____

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY

MIAMI-DADE COMMUNITY COLLEGE (SUPPLEMENT SHEET) Page 2

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Would Institution have [illegible]: Yes	Would Institution have [illegible]: No
				DATA CODE (Please "X")											
970-71	Administration of Affirmative Action and Equal Opportunity Programs	5% of President's Salary and 10% of Exec. Vice Pres. Salary.	$5,150.		X			X		X		X			X
		Office Overhead and Operating Expenditures	410.		X					X		X			X
		2% of Director of Admissions and Records and 2% of Assist. Salary	482.		X			X		X		X			X
	Recruitment	7% of Personnel Officer's Salary.	791.		X			X		X		X			X
		Office Overhead and Operating Expenditures	113.		X					X		X			X
		Recruitment by Administrators, Division Directors, & Dept. Chairmen, 2% of salaries.	32,220.		X			X		X		X			X
	Systems Work Personnel/Payroll	Computer Programs, Forms, Procedures, Processes, Data Element for sex and Ethnic. (Faculty and Students)	20,000.		X			X		X		X			X
971-72	Administration of Affirmative Action and Equal Opportunity Programs	5% of President's salary & 10% of Executive Vice President's Salary	5,408.		X			X		X		X			X

Respondent _____

Title _____

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FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY (SUPPLEMENT SHEET) Page 3

MIAMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Would Institution have Done this on its own: Yes	Would Institution have Done this on its own: No
			DATA CODE (Please "X")												
1971-72		Office Overhead and Operating Expenditures	$ 414.		X					X		X			X
		2% of Director of Admissions and Records and 2% of Assistant's Salary	515.		X			X		X		X			X
	Recruitment	7% of Personnel Officer's Salary	831.		X			X		X		X			X
		Office Overhead and Operating Expenditures	114.		X					X		X			X
		Recruitment by Administrators, Division Directors, & Dept. Chairmen. 2% of salaries.	40,505.		X			X		X		X			X
	Systems Work Personnel/Payroll	Computer Programs, Forms, Procedures, Processes. Data Element for sex and Ethnic. (Employees and Students)	20,000.		X			X		X		X			X
1972-73	Administration of Affirmative Action and Equal Opportunity Programs	5% of President's salary. and 10% of Executive Vice President's Salary	5,732.		X			X		X		X			X
		Office Overhead and Operating Expenditures	420.		X					X		X			X

Respondent _____

Title _____

Telephone _____

PLEASE XEROX AND USE ADDITIONAL SHEETS AS NECESSARY

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY
DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY

MIAMI-DADE COMMUNITY COLLEGE (SUPPLEMENT SHEET) Page 4

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost Due to Compliance: Definitely	4) Cost Due to Compliance: Questionable	Would Institution have [illegible]: Yes	Would Institution have [illegible]: [illegible]
				DATA CODE (Please "X")											
1972-73		2% of Director of Admissions and Records and 2% of Assist Salary.	$ 554.		X			X	X			X			X
	Adjustments to promotion Practices.	Clerical Staff	3,887.		X			X	X			X			X
	Recruitment	7% of Personnel Officer's Salary.	880.		X			X	X			X			X
		Office Overhead and Operating Expenditures	114.		X				X			X			X
		Recruitment by Administrators, Division Directors, & Dept. Chairmen. 2% of salaries.	41,990.		X			X	X			X			X
	Systems Work Personnel/Payroll	Computer Programs, Forms, Procedures, Processes. Data Element for sex and ethnic. (Employees and Students.)	20,000.		X			X		X		X			X
1973-74	Administration of Affirmative Action and Equal Opportunity Programs	5% of President's salary and 10% of Executive Vice President's Salary.	5,962.		X			X		X		X			X
		Office Overhead and Operating Expenditures	424.		X					X		X			X

Respondent _____

Title _____

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FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY

DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY

(SUPPLEMENT SHEET) Page 5

MIAMI-DADE COMMUNITY COLLEGE.

Please See Instruction Sheet For Classification of Categories

Program Description:

YEARS	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	5) Would Institution have [illegible] on Institution: Yes	5) Would Institution have [illegible] on Institution: No
				DATA CODE (Please "X")											
1973-74		2% of Director of Admissions and Records and 2% of Assistants' Salary	$ 601.		X			X		X		X			X
	Adjustments to promotion Practices	Clerical Staff	3,900.		X			X		X		X			X
	Recruitment	7% of Personnel Officer's Salary	958.		X			X		X		X			X
		Office Overhead and Operating Expenditures	115.		X					X		X			X
		Recruitment by Administrators Division Directors, & Dept. Chairmen. 2% of salaries.	54,776.		X			X		X		X			X
	Systems Work Personnel/Payroll	Computer Programs, Forms, Procedures, Processes. Data Element for sex and ethnic. (Employees and Students)	20,000.		X			X		X			X		X
1974-75	Administration of Affirmative Action and Equal Opportunity Programs	5% of President's salary and 10% of Executive Vice President's Salary	6,350.		X			X		X		X			X

Respondent _____

Title _____

Telephone _____

FEDERALLY-MANDATED SOCIAL PROGRAM COST STUDY
DATA COLLECTION SHEET

Program: AFFIRMATIVE ACTION PROGRAMS/
EQUAL EMPLOYMENT OPPORTUNITY

(SUPPLEMENT SHEET) Page 6

MIAMI-DADE COMMUNITY COLLEGE

Please See Instruction Sheet For Classification of Categories

Program Description:

DATES	TASK	BUDGET ITEM	COST	1) Nature of Cost: One Time	1) Nature of Cost: Annual	2) Benefit to the Institution: No direct benefit	2) Benefit to the Institution: Some	2) Benefit to the Institution: Substantial	3) Degree of Confidence in Data Provided: Actual Cost	3) Degree of Confidence in Data Provided: Estimate	3) Degree of Confidence in Data Provided: Speculation	4) Cost due to Compliance: Definitely	4) Cost due to Compliance: Questionable	Would Institution have done this on its own? Yes	Would Institution have done this on its own? No
				DATA CODE (Please "X")											
1974-75		Office Overhead and Operating Expenditures	$ 433.		X					X		X			X
		2% of Director of Admissions and Records and 2% of Assistant's Salary	655.		X			X		X		X			X
	Special Study for Affirmative Action	Written Contract, Salaries, etc.	5,000.		X			X		X		X			X
	Adjustments to promotion Practices	Clerical Staff	4,067.		X			X		X		X			X
	Recruitment	7% of Personnel Officer's Salary	947.		X			X		X		X			X
		Office Overhead and Operating Expenditures	116.		X					X		X			X
		Recruitment by Administrators, Division Directors, & Dept. Chairmen. 2½% of salaries.	73,054.		X			X		X		X			X
	Systems Work Personnel/Payroll	Computer Programs, Forms, Procedures, Processes. Data Element for sex and ethnic. (Employees and Students	20,000.		X			X		X		X			X

Respondent _____

Title _____

Telephone _____

SUMMARY OF REQUIRED REPORTS - 1976

The following chart of reports represents those State and Federal reports required of the College in 1976. The charts provide information on the type of report, its title and code, the frequency with which it must be completed, what area or individual at the College has responsibility for its completion, any pertinent information on its status, and any additional comments which might provide further clarification.

The charts are further divided into those that are State and those that are Federal requirements. Since the completion of these charts, many new reports have been added and many significant revisions to existing reports have taken place.

STATE REPORTS

TYPE OF REPORT	TITLE	FREQ. OF REPORTING	RESPONSIBLE FOR COMPLETION	STATUS	COMMENTS
COST ANALYSIS BY PROGRAM	CA-1 Identification of Operating Expenditures by Fund	11/1/76	Bernstein-Management Information Systems		New State numbering system required; extensive re-programm
	CA-2 Direct Cost of Primary and Support Programs	11/1/76	"		
	CA-3 Full Cost of Instruction	11/1/76	"		
PERSONNEL RESOURCES	PA-1 Personnel Resources Inventory	11/1/76	Personnel Office		
	PA-2 Occupational Prog. Personnel	9/1/76	" "		
	SA-1 Annual Salary Information (Fringe Benefits)	10/15/75	" " (Holladay)		
	SA-2 Selected Positions and Salary Schedules	10/15/75	" "		
STUDENT ENROLLMENTS-FUND. DATA	FA-1 Student Semester Hours-Next Year Estimates	11/15/75	Losak		
	FA-2 Student Semester Hours-Current Year Enrollments	10/1/75	Losak		
	FA-3 Student Semester Hours-Current Year Enrollments	2/15/76	Losak		
	FA-4 Student Semester Hours-Final Enrollments	9/15/76	Losak		
	FA-5 Approval for Courses in Other Registration Periods for the end of winter and end of spring/summer terms.	9/15/76	Losak		

STATE REPORTS

TYPE OF REPORT	TITLE	FREQ. OF REPORTING	RESPONSIBLE FOR COMPLETION	STATUS	COMMENTS
STUDENT ENROLLMENTS-FUND.DATA (continued)	EF-1 Opening Fall Enrollment	10/1/75	Losak		
	EF-2 Enrollment by Geographical Area	10/1/75	Losak		
	ET-1 End of Term Enrollment	1/15/76	Losak		
	ET-2 End of Term Enrollment	5/15/76	Matthewson		
	ET-3 End of Term Enrollment	9/1/76	Losak		
	EA-1 Annual Enrollment - Advanced and Professional	8/15/76	Matthewson		
	EA-2 Annual Enrollment-Occupational	8/15/76	Matthewson		
	EA-3 Annual Enrollment-Developmental & Community Instructional Services Enrollment	8/15/76	Matthewson		
INSTRUCTIONAL OUTPUTS	OA-1 Annual Instructional Outputs	9/1/76	Losak		
	OA-2 Instructional Acceleration Reports	9/1/76	Losak		
PLACEMENT AND FOLLOW-UP	AA-1 Placement & Follow-up Report	11/1/76	Skidmore/Smith	1974-present	Estimated $300,000 cost per year to me requirements in thi area. Information ficult to obtain, a of questionable val
	AA-2 Program Status Report - Performance Based	12/15/75	Skidmore/Smith	1973-present	

STATE REPORTS

TYPE OF REPORT	TITLE	FREQ. OF REPORTING	RESPONSIBLE FOR COMPLETION	STATUS	COMMENTS
STAFF AND PROGRAM DEVELOPMENT	SPD-1 SPD five-Year Goals Plan	3/1/76	Bernstein		
	SPD-2 SPD Activity Evaluation	9/10/76	Bernstein		
FINANCIAL RESOURCES	Program Budget (1976-77) Plant Fund Personnel Resources	8/1/75	Daly		
	Operating Budget Documents	6/1/76	Daly		
	Financial Report	8/15/76	Daly		
SPACE UTILIZATION RESOURCES	RF-1 Space Utilization Report	1/15/76	Brezner		
	RF-2 List of Fixed Capital Outlay Projects	3/14/76	Brezner		
	IU-1,2,3,4- Facilities Inventory Update	9/15/76	Brezner		
	Annual Utilization Report, Real Property	5/1/76	Brezner		
	CO-1 Annual Educational Facilities Plan	10/10/75	Brezner		
COMMUNITY INSTRUCTION	CI-1 Community Instruction-Citizenship	10/15/75 & once per term	Mehallis	New	
	CI-2 Community Instruction-Recreational	10/15/75 & once per term	Mehallis	New	

OTHER STATE REPORTS

TYPE OF REPORT	TITLE	FREQ. OF REPORTING	RESPONSIBLE FOR COMPLETION	STATUS	COMMENTS
OTHER REPORTS	Equal Access/Equal Opportunity	June and December, each year	Skidmore/Smith	Plan developed in Sept., 1975. Updates required every six months.	Requires extensive campus coordination College-wide & camp committees organiz to monitor progres
	SDE-Student Acceleration (CLEP)		Losak		
	SDE-Update of Program Inventory		Losak		
	SDE-Recommendations for Basic Education Resources Survey		Wiley	One-time request	Req. for recommendat of resource people provide assistance Basic Education Pro planning.
	U.S. Monthly Survey of Public Construction-Education	each month	Daly		
	State of Florida Sales & Use Tax	each month	Daly		
	SDE-Information on Community Instruction Courses		Matthewson		
	SDE-Enrollment Limitations & Entrance Requirements for approved courses		Matthewson		
	SDE-Community Services Non-Credit courses for funding		Campus Continuing Education Personnel		
	Southern Association of Colleges and Schools-Update Report		Walker		
	SDE-Cost of Deferment of Veterans Fees		Registrars & Daly		
	SDE-1975-76 Higher Education Directory Update		Losak		
	SDE-Survey on Computer Facilities		Nicely		

OTHER STATE REPORTS

TYPE OF REPORT	TITLE	FREQ. OF REPORTING	RESPONSIBLE FOR COMPLETION	STATUS	COMMENTS
	SDE-Course Outlines/Distributive Ed.		Mchallis		
	SDE-Morale Study		Kelly	One-time request	
	SDE-Survey/Exemption from Certification Requirements		McCabe		
	SDE-Administrative Procedures Act (Compliance)		Smith	New	Requires compliance with State regulations; coordination of all policy matters to meet Adv.& filing requirem'ts
	SDE-Questionnaires-				
	- Articulation Coordination Committee		Lundgren		
	- Post-Secondary Finance Committee		Losak		
	SDE-Title IX Coordinator and Self-Evaluation		Sutton	New	
	Florida Senate (Collective Bargaining)		Jay Freeman		
	SDE-(OE-2383-1) English Speak. Ability		Bain, Hansen, Padron	New	
	SDE-Students Transferring to State University System		Losak		
	SDE-Questionnaire on Funding Process		McCabe	New	
	SDE-1975/76 Fla. Educational Directory		Smith	Annual	Requires collection of information on M-DCC personnel
	SDE-Info regarding Fla. 12th Grade Test		Kelly		
	SDE-Archives History and Records Management		Kelly		

FEDERAL REPORTS

TYPE OF REPORT	TITLE	FREQ. OF REPORTING	RESPONSIBLE FOR COMPLETION	STATUS	COMMENTS
	HEW-Agreement Regarding Institutional Participation in the Guaranteed Student Loan Program		McFarland		
	OCR 1000-B1 - Student Applications, Acceptances, etc.		Losak		
	OCR 1000-B2 - Student Enrollment Survey		Losak		
	OCR 1000-B3 - Financial Assistance to Students		McFarland		
	OCR 1000-B4 - Earned Degrees		Losak		
	OCR 1000A1a - Professional & OCR 1000A1b - Non-Professional OCR 1000A3 - Employees OCR 1000A4 -		Holladay		
	HEW OE-1072 - Student Confirmation Report		Registrars		
	HEGIS-2300-2.1 - Degrees & Other Awards		Losak		
	HEGIS-2300-2.8 - Residence and Migration		Losak		
	EEO-6 - Higher Ed. Staff Information		Holladay		
	HEGIS 2300-5 Libraries		Campus Librarians		
	HEGIS OE 2300-4 - Financial Statistics 1975		Daly		
	E-6 - U.S.Department of Commerce, Annual Survey of Government Employment	Annual	Holladay		

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APPENDICES

APPENDIX A

STATE AND FEDERAL REGULATIONS AND REPORTING REQUIREMENTS

Administrator's Questionnaire

1. Since 1970, or since you began your present job, have you encountered imposed new requirements on your time and activities? If yes,

2. Would you briefly comment upon how you perceive your job to have changed in the past seven years as a result of these requirements?

3. Have you, within the past year or so, been confronted with any regulation or reporting requirement that you can identify as having originated at the State or Federal level? If yes,

4. Can you identify the legislation or regulation?

5. Approximately how much of your time has been expended in dealing with this regulation or reporting requirement that you have identified?

6. Are you able to comment about how this regulation or reporting requirement has impinged upon your regular activities? Have you been restricted or forced to curtail other activities as a result?

7. Do you have any perceptions regarding the value of the activities required with this regulation (or report) relative to the functioning of your job? (If so, please check the most appropriate response below.)
   It has been:
   (a) Very useful to me.
   (b) Useful to me.
   (c) Of limited use to me.
   (d) Of no discernible use to me.
   (e) Other perception - please comment.

8. Do you have any perceptions regarding the value of the activities required with this regulation (or report) relative to the internal functioning of the College?
   (If so, please check the most appropriate response below.)
   It has been:
   (a) Very useful to the internal functioning of the College.
   (b) Useful to the internal functioning of the College.
   (c) Of limited use to the internal functioning of the College.
   (d) Of no discernible use to the internal functioning of the College.
   (e) Other perception - please comment.

9. Do you have any perceptions regarding the value of the activities required with this regulation (or report) relative to the government body that issued or initiated it?
   (If so, please check the most appropriate response below.)
   It is apparently:
   (a) Very useful to the government body that has issued or

initiated it.
(b) Useful to the government body that has issued or initiated it.
(c) Of limited use to the government body that has issued or initiated it.
(d) Of no discernible use to the government body that has issued or initiated it.
(e) Other perception - please comment.

10. Do you serve on any committees or subcommittees within the College where the principal activities are mandated by Federal or State regulations? If so, which ones?

11. And finally, how much time do you spend on these committees?

APPENDIX A

INTERVIEW FOR FACULTY PERSONNEL

1. As a faculty member, how has your job changed in the past several years?

2. What do you perceive to be the causes of these changes?

3. Do you find that these changes are beneficial to your work and activities?

4. Have these changes diverted time and effort from your primary tasks as a faculty member?

5. How has the institution changed over your tenure?

6. Please elaborate.

7. Do you have difficulty understanding the purpose behind administrative decisions and regulatory activities that affect your work? If yes,

8. Could you elaborate; i.e., do you feel that there are simply too many regulations with which to deal successfully, or that they conflict with reality, or each other? Is there a lack of communication of the essential purpose of the required activity?

9. Can you identify any regulations affecting your work as having originated at the State or Federal government level? If yes,

10. In what <u>way</u> do they impact your job and activities?

11. Can you identify between the probably desired goals and the actual results of implementing these regulations on a daily basis?

12. Are you familiar with changes in Federal regulations concerning veterans? If yes,

13. Have these regulations had impact on your work? Do you believe that the impact on the College has been beneficial?

14. Do you know that Miami-Dade has an Equal Access/Equal Opportunity Plan? If yes,

15. In your view, what impact has this plan had on the College and on your activities as a faculty member?

16. Are you familiar with Title IX of the Higher Education Act? If yes,

17. How does it, in your view, impact the College or your activities as a faculty member?

APPENDIX B

PARTICIPANTS OF THE SELF STUDY

Mr. Milton C. Alderfer
Past Chairperson, Management, North

Ms. Angela Anderson
Associate Professor, Hotel Restaurant, Institutional Management, North

Mr. John Archibald
Associate Professor, Aviation, North

Ms. Zoila Benedico
Chairperson, Continuing Education, New World Center

Mr. Nicholas Benevento
Chairperson, Graphics, Fashion and Broadcasting, North

Dr. Edward Bernstein
Assistant to Dean of Arts and Sciences, North

Dr. Jeffrey Brezner
Director of Planning, District

Mr. William Cael
Research Associate, District

Mr. Clinton G. Cooper
Executive Assistant to Vice President, New World Center

Dr. Richard Corseri
Project Research Associate, District

Ms. Mary Dagraedt
Health, Recreation and Physical Education Coordinator, New World Center

Mr. John Dannelly
Director of Auxiliary Services, District

Mr. David Davidson
Coordinator of Business Affairs, District

Mr. Robert H. Drobner
Past Chairperson, Chemistry, North

Mr. Raymond Dunn
Assistant Dean of Students, New World Center

Ms. Elizabeth Forrester
Chairperson, Secretarial Careers, North

Mr. Jay Freeman
Director of Employee Relations, District

Dr. Nicholas Gennett
Dean of Student Development/Learning Support Services, North

Mr. Paul Gillespie
Professor, Graphic Arts Science, North

Ms. Sandy Glinn
Director of Staff and Program Development, New World Center

Mr. James Gray
Associate Professor, Business Administration, New World Center

Ms. Denise Hahn
Dean of Instruction, Nursing Education, Medical Center

Ms. Maria Hernandez
Assistant Registrar, South

Dr. Joanna B. Herrig
Chairperson, Counseling Center, North

Mr. Harry Hoffman
Coordinator of Business, New World Center

Mr. Wilbur Holladay
Director of Personnel, District

Dr. J. Terence Kelly
Vice President of Educational Services, District

Mr. Samuel LaRoue
Coordinator, Admissions and Registration Support Services, District

Mr. Ron Lawman
Chairperson of Health, Physical Education and Recreation, South

Mr. Brad Lawrence
Chairperson, Art/Philosophy, North

Dr. John Losak
Director of Institutional Research, District

Dr. Demie Mainieri
Director of Health, Physical Education and Leisure Services, North

Ms. Lillian Malin
Secretary to College Dean of Occupational Education, District

Ms. Jill Mangold
Administrative Assistant and Secretary to the President, District

Mr. Douglas E. Matthewson, Jr.
College Director of Admissions and Registration Services

Dr. Robert H. McCabe
Executive Vice President, District

Mr. John McDonald
Chairperson of Financial Aid, South

Mr. Thomas McFarland
College Director of Financial Aid and Veterans Affairs, District

Dr. George Mehallis
College Dean of Occupational Education, District

Dr. H. Phillip Nicely, Jr.
Dean of Systems Planning and Research, District

Mr. Lewis D. Ober
Chairperson, Biology, North

Mr. John Pistorino
Chairperson, Engineering and Architecture, South

Dr. Adrian W. Poitras
Assistant to Director of Administrative Support Services, North

Mr. Roosevelt Richardson, Jr.
Assistant Professor of Health, Physical Education and Recreation, North

Ms. Suzanne Richter
House Director, New World Center

Mr. Eugene Scott
Instructor, Water and Wastewater, South

Mr. Marvin Scott
Instructor, Physical Education, South

Dr. Richard Schinoff
Dean of Student Services, South

Mr. Albert Schlazer
Acting Director of Athletics, New World Center

Ms. Suzanne Skidmore
Administrative Assistant, District

Dr. Albert K. Smith
Executive Assistant to the Vice President, South

Ms. Cynthia Smith
Administrative Assistant, District

Mr. McGregor Smith, Jr.
Program Director, Life Lab, New World Center

Ms. Patricia Stephenson
Counseling Center and Program Consultant, Medical Center

Mr. John Stewart
Registrar, South

Dr. William Stokes
Vice President, New World Center

Mr. Henry W. Succop, Jr.
Chairman, Architecture and Building Construction, North

Dr. Lionel Sylvas
Administrative Assistant, North

Mr. John Takovich
Chairperson, Leisure Services, North

Mr. Horace Traylor
Dean for Development, District

Ms. Ramona Toomer
Administrative Assistant, District

Mr. Charles H. Walker
Dean of School and College Relations, District

Mr. Howard F. Weaver
Director of Instructional Resources, District

Mr. Rudy Williams
Associate Dean of Occupational Education, South

Mr. Ronald Young
Coordinator of Campus Equal Access/Equal Opportunit Activities, South

Mr. Richard Yount
Registrar, New World Center

APPENDIX C

MIAMI-DADE COMMUNITY COLLEGE

FACTS IN BRIEF

BACKGROUND: Established 1959; opened September, 1960; enrollment, 1,428

OPERATION: Multi-campus, two-year, state-supported community college. Four major campuses, seven centers, and Open College, an external learning unit. Largest college in Florida; largest two-year college in the nation. Governed at local level by a five-member District Board of Trustees and the President of the College.

LOCATIONS:
North Campus, N.W. 27th Avenue at 113th Street, Miami, Florida
South Campus, S.W. 104th Street at 110th Avenue, Miami, Florida
New World Center Campus, 300 N.E. Second Avenue, Miami, Florida
Medical Center Campus, 950 N.W. 20th Street, Miami, Florida
Marine Science Center, 1090 N.W. North River Drive, Miami, Florida
South Dade Center, 28401 S.W. 167th Avenue, Homestead, Florida
Homestead AFB Center, Homestead Air Force Base, Florida
Carver Center, 4901 Lincoln Drive, Coconut Grove, Florida
Martin Luther King Center, 220 N. Court, Northside Shopping Center, Miami, Florida
Jose Marti Educational Center, 2900 W. 12th Avenue, Hialeah, Florida
Westchester Center, 3000 S.W. 87th Avenue, Miami, Florida
Belen Center, 824 S.W. 7th Avenue, Miami, Florida
Beach Center, Miami Beach High School, 2231 Prairie Avenue, Miami Beach, Florida

ENROLLMENT:
Total, all campuses Fall 1977.....56,163
Credit Students, all campuses.....41,652
Non-Credit Students, all campuses.....14,511
Enrollment by Campus: North.....19,495
South.....21,737
New World Center.....10,975
Medical Center..... 1,867

CURRICULUMS: University Parallel Programs (Associate in Arts Degree)
Occupational Programs (Associate in Science Degree)

Technical Studies
Business Studies
Public Service Studies
Allied Health Studies
General Studies (Associate in General Studies Degree)
Continuing Education (non-credit)

COST TO STUDENT: Florida residents, $14 per credit; out-of-state students, $29 per credit. Full-time students (12 credits or more pay additional $7 for State Scholarship Fund). Cost for full-time student (12 credits) per semester, $175 plus approximately $50 to $60 for textbooks and supplies. Living costs are student's responsibility. Miami-Dade has no dormitories.

BOARD OF TRUSTEES:
Mitchell Wolfson, Chairman
Jack Kassewitz, Vice Chairman
Garth C. Reeves, Sr.
Maria C. Hernandez
Talbot D'Alemberte

PRESIDENT: Peter Masiko, Jr.

ACCREDITATION: Florida State Department of Education
Southern Association of Colleges and Schools